

Part A Supporting Statement for Paperwork Reduction Act Submission
Evaluation of Cohort 1 of the Moving to Work Demonstration Program Expansion
OMB Control # 2528-0328

- 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 submission is an extension of a currently approved collection (2528-0328). The information collection for the *Evaluation of Cohort 1 of the Moving to Work Demonstration Program Expansion* was initially approved by OMB on February 21, 2021 for a period of three years (expiring February 29, 2024). This extension will allow additional data collection through 2025, at which point the evaluation will conclude. The data collection instruments submitted with this extension are unchanged from the instruments that were previously approved by OMB and which have been administered for the past three years. This Supporting Statement Part A has been modestly updated to include information pertaining to the initial three years of the evaluation.

The U.S. Department of Housing and Urban Development (HUD)'s Office of Policy Development and Research (PD&R) was directed by Congress to evaluate the Moving to Work demonstration program expansion. Moving to Work (MTW) is a demonstration program that encourages public housing agencies (PHAs) to test ways to achieve any or multiple of three specific objectives: increase the cost effectiveness of federal housing programs, encourage greater self-sufficiency of households receiving housing assistance, and increase housing choice for low-income families. MTW designation gives PHAs relief from many of the regulations and statutory provisions that apply to the public housing and Housing Choice Voucher (HCV) programs. MTW agencies can also merge their public housing and HCV funds into a single block grant and use these funds (if desired) for local activities outside the typical public housing and HCV programs, such as providing supportive services or developing housing for populations with special needs.

In 2016, Congress authorized HUD to expand the MTW program by 100 high performing PHAs. Cohort 1 is the first of five cohorts that HUD has identified for the MTW expansion. Cohort 1 is limited to PHAs with no more than 1,000 housing units across their HCV and public housing programs ("small" PHAs). In Cohort 1, PHAs are free to implement any program and policy change permissible under the MTW program. HUD will learn from the *Evaluation of Cohort 1 of the Moving to Work Demonstration Program Expansion* (Cohort 1 Evaluation) how small PHAs choose to use MTW flexibility and how their choices affect PHA and tenant outcomes.

By focusing on small PHAs, the Cohort 1 Evaluation fills a gap in the knowledge base on the effects of regulatory and funding flexibility on small PHAs and their tenants. Small PHAs account for about 80 percent of the agencies that administer the HCV and public housing programs but only about 20 percent of the assisted units. Small PHAs do not enjoy the same economies of scale as larger PHAs with their program administration and thus tend to find federal regulations more burdensome and costly. Given that only one of the current 39 MTW agencies is small, HUD knows relatively little about how small agencies and their tenants might benefit from MTW flexibility. The Cohort 1 Evaluation—supported by this information collection request (ICR)—will help HUD evaluate the value of MTW for smaller PHAs.

HUD contracted with Abt Associates Inc. to conduct the Cohort 1 Evaluation. 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.

Overview of Study and Data Collection Request

The Cohort 1 Evaluation will answer two main questions:

- How do small PHAs use their MTW flexibility?
- What are the consequences of MTW flexibility for small PHAs and their tenants?

The Cohort 1 Evaluation is collecting descriptive information on the programs and policies implemented by the set of 43 PHAs involved in the study. The evaluation is also comparing the outcomes achieved by the MTW PHAs to those achieved by similar PHAs who do not have MTW designation in order to evaluate the impact of MTW designation.

Between October 2018 and May 2019, HUD invited PHAs with up to 1,000 combined units to apply for MTW designation under Cohort 1. Forty-three (43) PHAs completed the initial application process and met the eligibility requirements for Cohort 1. In November 2019, HUD randomly assigned the 43 PHAs into a treatment group (33 PHAs) and a control group (10 PHAs) for the purposes of the Cohort 1 Evaluation. In late August 2020, HUD notified the 33 treatment group PHAs that they had been selected to apply for MTW designation, and 31 PHAs ultimately followed through the application process and were designated as MTW agencies. The 10 PHAs in the control group continue to operate under the regular program rules. With this experimental design, the evaluation can make definitive statements about the impact of MTW if the PHAs in the treatment group experience different outcomes from those in the control group. For the purposes of this information collection, however, we will reference MTW PHAs (n = 31) from whom we will ask one set of questions related to their MTW experience, and non-MTW PHAs (n = 12), which include the 10 PHAs that were randomly assigned to the control group *plus* the 2 PHAs that were assigned to the treatment

group but who did not take up the program. Questions posed to the non-MTW PHAs relate to activities or policies that they may be implementing in the absence of MTW designation.

To the extent possible, the Cohort 1 evaluation is using existing data that PHAs already prepare and submit to HUD for the purposes of program administration. However, the evaluation requires modest primary data collection from PHAs to (1) clarify and expand on information in the existing data and (2) obtain qualitative information about the experiences of PHAs implementing activities related to cost effectiveness, self-sufficiency, or housing choice with and without MTW flexibility.

This submission requests OMB approval for three data collection activities:

- 1) Interviews with MTW PHAs (included as Appendix B).
- 2) Online surveys to non-MTW PHAs (included as Appendix C).
- 3) Interviews with non-MTW PHAs (included as Appendix D).

Data collection activities began in March 2021 and will continue through April 2025.

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 an extension of a currently approved collection. The data collection instruments submitted with this extension are unchanged from the instruments that were previously approved by OMB and which have been administered for the past three years. The evaluation is structured to produce a series of annual reports that document the study findings. To date, HUD has published two of five anticipated annual reports. The first report, titled *Evaluating MTW Flexibility for Smaller PHAs: Baseline Report*, explores PHA motivations for participating in MTW and the interrelated objectives that these new MTW agencies hope to pursue using the flexibilities afforded through their MTW designation. The second report, titled *Evaluation of the Moving to Work Flexibility Cohort: First Year of MTW Eligibility*, continue to report on the experiences of these small PHAs as they transition to MTW agencies and begins to explore the outcomes across the first cohort of expansion agencies. All published evaluation reports are available on HUD/PD&R's website located here: <https://www.huduser.gov/portal/mtw/cohort1.html>.

HUD is using the information collected to learn about how small PHAs use their MTW flexibility to meet the MTW program's goals. The information collected also is being used to inform the analysis of the impact of MTW designation on PHA and tenant outcomes. Abt Associates Inc., the evaluation contractor, continues to carry out the data collection and analysis on HUD's behalf.

Description of Data Collection Activities

Interviews with MTW PHAs

Over the course of the entire evaluation, Abt Associates will conduct five rounds of interviews with the 31 PHAs in the study's treatment group that received MTW designation under Cohort 1. To date, three rounds of data collection have been conducted. In each round, Abt research staff interview up to three staff involved in the MTW program (for example, the PHA's Executive Director, HCV Director, and Public Housing Director). The first round of interviews took place in the spring of 2021, shortly after around the PHAs received MTW designation (baseline), and subsequent rounds of data collection have taken place in spring of 2022 and spring of 2023. Two rounds of data collection remain to be completed and are expected to be carried out in spring of 2024 and spring of 2025.

The interviews with MTW PHAs are designed to answer the research questions and sub-questions in Exhibit A-1. There is no other data source for these questions. The study team are using the data collected through the interviews with MTW PHAs to inform annual reports to HUD.

Exhibit A-1. Questions to be Addressed in Interviews with MTW PHAs

Research Questions	Sub-Questions
Why do small PHAs apply for MTW?	• What motivated the PHAs to apply for MTW designation? • What programmatic or operational goals were they seeking to meet? • What role did the Board and other community stakeholders play in the decision to apply? • Which statutory objectives and MTW waivers were most important to PHAs at time of initial application? • What programmatic or operational changes did the PHAs intend to make? • How did the PHAs expect to use MTW funding flexibility? • Did PHAs' motivations for applying change between the first and second step of the application? • Did PHAs' expected use of MTW flexibilities change between the first and second step of the application?
How do small PHAs use MTW flexibility?	• What were PHAs' objectives in implementing their MTW activities? • What role did the Board and other stakeholders play in the choice of activities? • How did the MTW PHAs use their funding flexibility? • How did PHAs' use of MTW flexibilities change over time? • How did the PHAs' MTW activities affect PHA operations and staffing? • How did the PHAs' participation in MTW affect their relations with tenants or the broader community? • How do PHAs describe their experiences with MTW?

The research team developed slightly different interview guides for the first (baseline) interview and for the subsequent four annual interviews. The main differences between the

two guides is that the baseline interview covered motivations for applying for MTW, and the annual interview incorporates information obtained from the previous year's interview to reduce respondent burden. The baseline interview guide was administered during the initial year of data collection (spring of 2021) and so all subsequent annual interviews are using the interview guide included as Appendix B, titled the *Interview Guide for MTW PHAs*. Each interview is expected to last about one hour.

Online Surveys to Non-MTW (Control Group) PHAs

The Abt research team is also fielding a simple online survey with the 12 non-MTW PHAs. To reduce burden, data is collected from the non-MTW every other year, for a total of three times over the course of the study. The purpose of the survey is to identify any program or policy changes the PHA has implemented or is considering implementing that relate to cost effectiveness, self-sufficiency, or housing choice—the three statutory objectives of MTW—even in the absence of MTW designation. In order to contextualize the study's estimates of MTW impact derived from analysis of impact data, we need to understand how different program implementation is between the MTW and non-MTW PHAs in these three areas.

The online survey is an easy way to gather initial information on whether non-MTW PHAs are pursuing any relevant activities. If we learn through the online survey that a PHA has made program and policy changes related to any of the MTW statutory objectives, we will interview the staff of that PHA to learn more (see *Interviews with Non-MTW PHAs* below).

The research team developed slightly different online survey instruments for the first (baseline) survey and for the subsequent (semi-annual) surveys. The main differences between the two surveys is that the baseline survey covers motivations for applying for MTW, and the subsequent survey instrument incorporates previously captured information to reduce respondent burden. The baseline interview guide was administered during the initial year of data collection (spring of 2021) and so all subsequent annual interviews are using the interview guide included as Appendix C, titled the *Online Survey Instrument for Non-MTW PHAs*. Each survey is expected to take one staff no more than 30 minutes to complete.

In advance of sending out the survey, the Abt team reviews the PHAs' Administrative Plan (Admin Plan) and Admissions and Continued Occupancy Policy (ACOP) for any program or policy changes described in those documents. Any changes noticed are identified in the cover email to the survey so that the PHA is aware of our interest in those areas.

Interviews with Non-MTW PHAs

If a non-MTW PHA indicates on the online survey that it has implemented (or plans to implement) any activities related to cost effectiveness, self-sufficiency, or housing choice, Abt research staff will interview one to two PHA staff to learn more about those activities. These interviews will take place within two weeks of the Abt team receiving the PHA's

response to the online survey—at approximately the same time as the interviews with MTW PHAs. Each interview is expected to last about one hour.

The interviews with non-MTW PHAs will answer the research questions and sub-questions shown in Exhibit A-2.

Exhibit A-2. Questions to be Addressed in Interviews with Non-MTW PHAs

Research Questions	Sub-questions
Which activities did the non-MTW PHAs implement related to the statutory objectives?	• Which activities (i.e., programs, policies, or procedures) did the PHAs implement? • Did the PHAs obtain waivers from HUD to implement the activities? Would the PHAs have made a different program or policy change had they received MTW designation? • Which statutory objective(s) did the activities to relate to? • Were the PHAs seeking to meet other, local goals with their activities? • To what extent did tenant or other stakeholder input affect the choice of activities?
How did the activities affect PHA operations and staffing?	• Did the activities implemented affect PHA procedures? • Did the activities implemented affect program costs? • Did the PHA realize administrative cost savings? • Did the activities implemented affect PHA staffing levels? • Did the activities implemented affect program budgets?

There is no other data source for answering the questions in Exhibit A-2. These questions enable the research team to compare the program and policy changes that non-MTW PHAs make to those made by the MTW PHAs. This information provides important context for interpreting the study’s impact estimates. For example, if none of the non-MTW PHAs implement any program or policy changes in these areas, while all of the MTW PHAs do, we would expect to see a greater impact of MTW. If we learn that the control group PHAs are able to implement similar program and policy changes absent MTW designation, we would not expect to find as large a difference in outcomes. The data collected through the interviews with non-MTW PHAs were used for the evaluation’s Baseline Report and are incorporated into the annual outcome reports. The research team developed slightly different interview guides for the first (baseline) interview and for the follow-up interviews. The main difference between the two guides is that the follow-up interview guide incorporates information obtained from the previous year’s interview to reduce respondent burden. The baseline interview guide was administered during the initial year of data collection (spring of 2021) and so all subsequent annual interviews are using the interview guide included as Appendix D, titled *Interview Guide for Non-MTW PHAs*. Each interview is expected to last about one hour.

Justification for Data Collection Instruments

Exhibit A-3 summarizes the necessity of the planned data collection under each data collection instrument.

Exhibit A-3. Justification of Data Collection Instruments

Instruments	Respondents, Content, and Reason for Inclusion
Interview Guide for MTW PHAs (Appendix B)	Respondents: Executive Directors and staff at MTW PHAs (31 PHAs) Content: • Introduction ○ Status update of MTW program ○ Any changes that affect MTW program • Development of MTW Supplement (MTW report required by HUD) • Changes in program goals and activities since MTW Plan or last MTW Supplement • Implementation to date of MTW Waivers and activities • Information on any local non-traditional programs • Lessons learned and recommendations Reason: The annual interviews with key MTW PHA staff are essential for answering process study research questions on implementation challenges, lessons learned, and other qualitative aspects of MTW execution that cannot be captured through administrative data.
Online Survey Instrument for non-MTW PHAs (Appendix C)	Respondents: Executive Directors and staff at Non-MTW PHAs (12 PHAs) Content: • Objectives for applying to MTW and plans for future application (baseline) • Activities implemented related to the statutory objectives • Programs or policy changes to implement if designated MTW PHA • Space to enter additional thoughts Reason: The main purpose of the survey is to identify any program or policy changes the PHA has implemented related to cost effectiveness, self-sufficiency, or housing choice. This survey allows the study team to identify which non-MTW PHAs to interview.

Instruments	Respondents, Content, and Reason for Inclusion
Interview Guide for Non-MTW PHAs (Appendix D)	Respondents: Executive Directors and staff at non-MTW PHAs that are implementing activities in the areas of cost effectiveness, self-sufficiency, or housing choice (12 PHAs) Content: • Update on activities underway and discussed in prior interviews (goals, household application, other information about activity) • New activities not discussed in prior interviews (goals, household application, other information about activity) • Outcomes realized to date • Implementation challenges and lessons learned • Interest in applying for MTW in future Reason: The purpose of the interview is to learn more about the program and policy changes that non-MTW PHAs implement in the absence of MTW flexibility. The interviews will provide information on how PHAs without MTW status are implementing activities related to MTW statutory objectives, and whether there are challenges or lessons to be learned. The information from the interviews will be informative to HUD’s MTW program office and will also provide context for the evaluation’s impact estimates.

Study Deliverables

HUD and policy makers will use the information collected through the Cohort 1 evaluation to understand how small PHAs use the flexibility offered by MTW to advance the program’s statutory objectives of cost effectiveness, self-sufficiency, and housing choice. The evaluation will also provide HUD rigorous evidence of the impact of MTW designation on outcomes related to the statutory objectives.

To date, HUD has published two of five anticipated annual reports. The first report, titled *Evaluating MTW Flexibility for Smaller PHAs: Baseline Report*, explores PHA motivations for participating in MTW and the interrelated objectives that these new MTW agencies hope to pursue using the flexibilities afforded through their MTW designation. The second report, titled *Evaluation of the Moving to Work Flexibility Cohort: First Year of MTW Eligibility*, continue to report on the experiences of these small PHAs as they transition to MTW agencies and begins to explore the outcomes across the first cohort of expansion agencies. All published evaluation reports are available on HUD/PD&R’s website located here: <https://www.huduser.gov/portal/mtw/cohort1.html>.

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.**

An online survey is administered to the non-MTW PHAs to identify those PHAs for which an interview is justified. The survey is programmed in SurveyGizmo, an extremely user-friendly survey application. Respondents receive a link to the survey via email and enter their responses directly into the survey. PHAs also have the option to complete the survey by telephone if they prefer.

Interviews are conducted remotely via secure videoconference platform (Webex or Teams) or over the telephone, with interviewers recording responses directly into Word documents on a laptop. Use of the laptops allows interviewers to quickly record data and continue with the interview without extended pauses or delays.

Interview responses are directly uploaded to NVivo, a qualitative data analysis software for coding and analysis.

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 not aware of any other studies for which this study represents a duplicate research effort. While the MTW program has existed since the late 1990s, the MTW Expansion entails new requirements and activities that have never been studied. Also, the Cohort 1 evaluation is the only MTW evaluation focused exclusively on small PHAs.

During the study's design phase, the research team closely examined existing HUD data sources to identify the primary data collection needed to address the study's research questions. The team concluded that a large amount of information was available through existing HUD data systems but that some primary data collection was needed to supplement the existing data sources. For example, there are no existing data sources addressing the following types of questions of importance to the evaluation:

- What programmatic or operational challenges were PHAs seeking to address in applying for MTW? What other factors played a role in the decision to apply?
- How did the MTW PHAs' activities affect PHA operations and staffing?
- How did the MTW PHAs' participation in MTW affect its relations with residents or the broader community?
- How do MTW PHAs describe their experiences with MTW?
- What "lessons learned" or advice do the PHAs have for other agencies seeking MTW or for new MTW PHAs?
- Which activities did non-MTW PHAs implement related to the statutory objectives?
- How did the non-MTW PHAs' activities affect PHA operations and staffing?

The careful process the research team undertook to review all existing data sources ensures that the current ICR is not a duplication of effort.

To reduce respondent burden, before conducting the interviews with PHA staff, the study team reviews all available secondary information for each PHA, such as the MTW Supplement (for MTW PHAs), Administrative Plan, ACOP, and data collected through HUD's Financial Data System. The team also pre-populates the interview guides with information collected through the previous years' online surveys and interviews to minimize the burden on PHA staff.

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

This data collection does not affect small businesses. Some of the PHAs in the study may qualify as small entities depending on the size of their jurisdictions. The methods used to reduce respondent burden for all PHAs (described in item 4) also applies to these PHAs.

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 authorization of the expansion of the MTW program included a mandate that HUD rigorously evaluate the expansion. Without this data collection effort, HUD will be unable to evaluate the implementation and impact of MTW designation on the first cohort of small PHAs. The data collection covered by this ICR is essential for answering research questions regarding MTW implementation and for providing context for interpreting the study's impact analyses. If this data collection is not conducted or conducted less frequently, HUD would not be able to adequately answer the study's key research questions or be responsive to the Congressional mandate to evaluate the program.

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), 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 Cohort 1 Evaluation. HUD published a 60-Day Notice of Proposed Information Collection in the Federal Register on November 16, 2023 (citation: 88 FR 78774, pp. 78774-78775), Agency/Docket Number: Docket No. FR-7075-N-14, published 11/16/2023). The notice provided a 60-day period for public comments, and comments were due January 16, 2024.

No public comments were received. A copy of the 60 Day Federal Register Notice is included as Appendix E.

The Cohort 1 Evaluation was developed and is being implemented by Abt Associates Inc., HUD's contractor. Key members of the Abt team include Principal Investigator Dr. Judy Geyer; Project Director Dr. Larry Buron; Data Collection Manager Tanya de Sousa; Project Quality Advisor Dr. Jill Khadduri; and Director of Analysis Douglas Walton. Staff from HUD's Office of Policy Development and Research and Office of Public and Indian Housing have collaborated with the Abt study team on study design and data collection plan. In addition, Abt has established a panel of Senior Advisors to provide review and input at all phases of the study.

The study's data collection period is five years. Throughout the data collection period, the Abt team hosts webinars for the PHAs in the study to keep them apprised of data collection activities and study findings.

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

There will be no payments or gifts to respondents.

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 an independent research team, Abt Associates Inc., to conduct this research effort. HUD and Abt Associates 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.

All research staff working on the project have been trained to protect private information and the study has a Data Security Plan governing the storage and use of the data collected through the study. Individuals will not be cited as sources of information in prepared reports. All respondents included in the study will be informed that their participation in the data collection is voluntary and the information they provide will be used only for research purposes.

- 11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.**

The data collection instruments do not contain any sensitive questions.

- 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.**

In accordance with the research design, interviews with the MTW PHAs take place annually for each of five years. Data collection with the non-MTW PHAs (both the online survey and the interviews) take place every other year (year 1, year 3, and year 5 of data collection).¹ There are two years remaining in the Evaluation of Cohort 1, and over the course of these last two years, we will conduct two additional rounds of data collection with the MTW PHAs (during spring of 2024 and spring of 2025) and we will conduct a single additional round of data collection from the non-MTW PHAs (spring of 2025).

The hour burden in Exhibit A-4 comes from three data collection activities as follows:

Interview Guide for MTW PHAs

There are two years remaining in the evaluation period. We expect to interview up to three staff at each of the 31 MTW PHAs annually for the next two years, for a total of 93

¹ Year 1 data collection is the baseline data collection.

respondents per year. The interviews take approximately one hour to complete. The total estimated annual burden for the interviews with MTW PHAs is 93 hours; 3 hours per PHA. The interview guide is included as Appendix B

Online Surveys to Non-MTW PHAs

We expect one staff at each of the 12 PHAs in the study's non-MTW group (including the 10 PHAs in the control group and the 2 PHAs in the treatment group who did not take up the program) to complete the online survey for non-MTW PHAs. We expect to administer this survey a single time in the remaining two years of the evaluation. There will be a total of 12 respondents, and the survey will take about 30 minutes to complete. The total estimated annual burden is 6 hours. The survey instrument is included as Appendix C.

Interviews with Non-MTW PHAs

We expect to interview up to two staff at each of the 12 non-MTW PHAs in the study, and we expect to administer this survey a single time in the remaining two years of the evaluation. There will be a total of 24 respondents, and the interviews will take about one hour to complete. The total estimated annual burden is 24 hours. The interview guide is included as Appendix D.

Exhibit A-4 provides the total estimated hour and cost burden per year for the information collection.

Exhibit A-4: Estimated Annual Hour and Cost Burden of Information Collection

Annualized Burden Table							
Information Collection	Number of Respondents	Frequency of Response	Responses Per Annum	Burden Hour Per Response	Annual Burden Hours	Hourly Cost Per Response	Cost
Interview Guide for MTW PHAs	93	1	93	1	93	\$52.14	\$4,849.02
Online Survey for Non-MTW PHAs	12	1	12	0.50	6	\$52.14	\$312.84
Interview Guide for Non-MTW PHAs	24	1	24	1	24	\$52.14	\$1,251.36
Total	129.00				123		\$6,413.22

The total estimated annual cost for this information collection is \$6,413.22. To estimate the hourly cost per respondent, the research team used the average hourly compensation (wages

and benefits) for state and local government workers according to the Bureau of Labor Statistics' Employer Costs For Employee Compensation survey from December 2019 (<https://www.bls.gov/news.release/pdf/ecec.pdf>).

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 as described in item 12 above. There is no known 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.

The current effort is being carried out under a HUD Contract with Abt Associates. HUD estimates the annual costs to the Federal government for this data collection and analysis of these data to be approximately \$100,000 per year in professional labor. The professional labor cost estimates for this information collection include project management staff, survey methodologists, interviewers, and IT support staff. Exhibit A-5 summarizes the cost breakdown

Exhibit A-6: Estimated Annual Cost to the Federal Government

Activity	Estimated Cost to Federal Government	Total Labor Hours For Information Collection
Professional Labor	\$100,000	827 hours
Total	\$100,000	827 hours

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

This submission is a extension of a currently approved collection (2528-0328). The number of respondents and the estimated burden for each of the survey instruments, as depicted in the response to question 12, has been modestly revised from the original supporting statement submitted to OMB in 2021 for this information collection. The reason for these modest changes is twofold. First, when the study was initially designed, HUD anticipated 33 PHAs in the treatment group and 10 PHAs in the control group. However, two PHAs from the treatment group chose not to take up their MTW designation so for the purpose of the qualitative data collection described in this supporting statement, we different samples than we had originally anticipated, including 31 MTW PHAs and 12 non-MTW PHAs. Second, the burden of responding to each of the survey instruments has been adjusted based on the actual response time that has been observed over the past three years of data collection.

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 for the Cohort 1 Evaluation will be analyzed, tabulated, and reported to HUD by the evaluation contractor, Abt Associates. Exhibit A-6 presents an overview of the data collection and analysis schedule. Data collection began in February 2021.

Exhibit A-7: Project Schedule

Timeframe	Activity	Notes
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March 2021 – April 2021	Baseline Interviews with MTW PHAs	Provides information on PHA motivations for applying for Cohort 1 and the program and policy changes they intend to pursue using MTW flexibilities.
March 2021	Baseline Online Survey with non-MTW PHAs	Provides information on PHA motivations for applying for Cohort 1. Identifies non-MTW PHAs planning to implement policy and program changes in the areas of cost effectiveness, self-sufficiency, or housing choice.
April 2021	Baseline Interviews with non-MTW PHAs	Provides information on program and policy changes PHAs plan to pursue absent MTW flexibilities.
May 2021 – June 2021	Analysis of baseline survey and interview data	
June 2021	First Draft Baseline Report	
July 2021	Second Draft Baseline Report	
September 2021	Final Baseline Report	
February 2022 – April 2022	Annual Interviews with MTW PHAs	Provides information on program and policy changes PHAs are pursuing using MTW flexibilities.
May 2022 – June 2022	Analysis of Year 1 annual survey and interview data	
June 2022	Draft Annual Report 1	
July 2022	Second Draft Annual Report 1	
September 2022	Final Annual Report 1	
February 2023 – April 2023	Annual Interviews with MTW PHAs	Provides information on program and policy changes PHAs are pursuing using MTW flexibilities.
February 2023	Annual Online Survey with non-MTW PHAs	Identifies non-MTW PHAs implementing policy and program changes in the areas of cost effectiveness, self-sufficiency, or housing choice.
April 2023	Annual Interviews with non-MTW PHAs	Provides information on program and policy changes PHAs are pursuing absent MTW flexibilities.
May 2023 – June 2023	Analysis of Year 2 annual survey and interview data	
June 2023	Draft Annual Report 2	
July 2023	Second Draft Annual Report 2	
September 2023	Final Annual Report 2	
February 2024 – April 2024	Annual Interviews with MTW PHAs	Provides information on program and policy changes PHAs are pursuing using MTW flexibilities.
May 2024 – June 2024	Analysis of Year 3 annual survey and interview data	

June 2024	Draft Annual Report 3	
July 2024	Second Draft Annual Report 3	
September 2024	Final Annual Report 3	
February 2025 – April 2025	Annual Interviews with MTW PHAs	Provides information on program and policy changes PHAs are pursuing using MTW flexibilities.
February 2025	Annual Online Survey with non-MTW PHAs	Identifies non-MTW PHAs implementing policy and program changes in the areas of cost effectiveness, self-sufficiency, or housing choice.
April 2025	Annual Interviews with non-MTW PHAs	Provides information on program and policy changes PHAs are pursuing absent MTW flexibilities.
May 2025 – June 2025	Analysis of Year 4 annual survey and interview data	
June 2025	Draft Annual Report 4	
July 2025	Second Draft Annual Report 4	
September 2025	Final Annual Report 4	

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.

All data collection instruments will prominently display the expiration date for OMB approval.

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

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