

**Supporting  
Statement for OMB  
Clearance Request  
Part A**

**Moving to Work,  
Landlord Incentives  
Cohort Evaluation**

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## Part A: Supporting Statement for Paperwork Reduction Act Submission: Interview Guides and Surveys

### Overview

The Office of Policy Development and Research (PD&R) at the U. S. Department of Housing and Urban Development (HUD) contracted with Abt Associates (in partnership with the University of Hawai'i) to conduct an evaluation of the Moving to Work, Landlord Incentives cohort. As required under the Paperwork Reduction Act, HUD seeks approval from the Office of Management and Budget (OMB) for data collection instruments associated with the evaluation.

The Housing Choice Voucher (HCV) program is tenant-based housing assistance program and is the Department of Housing and Urban Development's (HUD's) largest rental assistance program. Rather than limiting households to rental units located in specific housing projects, the HCV program lets households use vouchers to find their own housing in the private rental market. For this reason, the HCV program works well only if private market landlords are willing to make their units available to voucher holders. Many public housing agencies (PHAs) struggle to attract and retain landlords in the program, leading to low rates for voucher holders successfully leasing units and other program inefficiencies.

Moving to Work (MTW) is a HUD demonstration program that encourages PHAs to test ways to 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 HCV and public housing programs. MTW was initially authorized by Congress in 1996, and in 2016, HUD was authorized to expand the Demonstration to an additional 100 PHAs.

In January 2021, HUD published a Request for Applications for the Landlord Incentives Cohort of the MTW Expansion. In this cohort, PHAs will implement incentives for landlords to encourage their participation in the HCV program. In January 2022, HUD announced that twenty-nine (28) PHAs were selected to participate in the Landlord Incentives Cohort. PHAs participating in the Landlord Incentives Cohort must adopt at least two incentives from a menu of nine incentive options. Incentive options include payment standards flexibility, one-time financial incentives (such as signing bonuses and damage reimbursements), and simplified inspections processes. The goals of these incentives are: (1) to increase landlord participation in the HCV program and (2) to increase voucher holder success rates in leasing units in the program.

The *Moving to Work Landlord Incentives Evaluation* ("Landlord Incentives Evaluation"), led by Abt Associates, will examine how PHAs implement these incentives and how these incentives affect program outcomes. This request relates to primary data to be collected for the Landlord Incentives Evaluation.

This supporting statement is the first in a series of OMB submissions that correspond to an array of data collection activities for the evaluation of the Moving to Work, Landlord Incentives cohort. HUD seeks clearance in this submission for:

- Semi-structured interview guides for site visits and telephone interviews with staff from treatment and a subset of comparison PHAs;
- Online surveys to treatment and comparison PHAs; and

- Semi-structure interview guides for site visits with landlords within treatment and a subset of comparison PHA jurisdictions.

## A.1: Necessity for the Data Collection

The Landlord Incentives Evaluation—supported by this information collection request (ICR)—will help HUD determine whether and how landlord incentives result in greater acceptance of HCVs among landlords. HUD contracted with Abt Associates for the Landlord Incentives Evaluation. This research is conducted under the authority of the HUD Secretary to undertake programs of research, studies, testing, and demonstration related to the mission and programs of HUD (12 USC 1701z-1 et seq.).

The Landlord Incentives Evaluation will collect descriptive information on the programs and policies implemented by 28 PHAs selected to join the Landlord Incentives Cohort (“treatment PHAs”). To rigorously evaluate the impact of the landlord incentives, the study will also compare the outcomes achieved by the treatment PHAs to those achieved by a group of 112 similar PHAs who do not have MTW designation (“comparison PHAs”).

The Landlord Incentives Evaluation includes three components: a *process study*, an *impact study* and a *cost study*. Each component addresses different research questions and uses different research approaches. A summary of the three study components and the corresponding research questions is shown in Exhibit 1 below.

### Exhibit 1: Study Components and Research Questions

Study Component	Research Questions
<p><b>Process Study:</b> describing how landlord incentives are implemented</p>	<ul style="list-style-type: none"> <li>• Why did PHAs decide to apply for the MTW Landlord Incentive Cohort?</li> <li>• Among the PHAs receiving that designation, what landlord incentives did PHAs select from among the menu of landlord incentives offered them by HUD? Why did they choose the incentives they did? How did they implement their chosen incentives? To what extent did their choice of incentives and implementation vary by market conditions or other factors?</li> <li>• Among PHAs without the MTW designation (the comparison group), did they implement any landlord incentives permitted by HUD to non-MTW PHAs? If so, which incentives did they choose and why? How did they implement those incentives?</li> <li>• To what extent were landlords aware of the incentives implemented by the Landlord Incentive Cohort?</li> <li>• To what extent did landlord willingness to accept vouchers for some or all units change in response to the incentives?</li> <li>• Which incentives were most important in motivating landlords to accept voucher holders?</li> <li>• How was any change in landlord willingness to rent to voucher holders affected by the community and housing market context in which the PHAs implemented the incentives?</li> </ul>
<p><b>Impact Study:</b> describing impact of landlord incentives on program outcomes</p>	<ul style="list-style-type: none"> <li>• What are the impacts of the MTW landlord incentives on landlord participation in the HCV program?</li> <li>• What are the impacts of the MTW landlord incentives on the success of households in using their vouchers to lease housing units?</li> </ul>
<p><b>Cost Study:</b> describing costs and savings associated with</p>	<ul style="list-style-type: none"> <li>• For PHAs that offered financial incentives, how often did they pay out particular incentives (for example, signing bonuses) and how much was the average payment?</li> <li>• For PHAs that simplified inspections, what administrative cost savings did the PHAs realize?</li> <li>• How much did implementing landlord incentives affect the per-unit costs of housing assistance</li> </ul>

landlord incentives	payments? • If landlord incentives had an impact on success rates, what administrative cost savings did the PHAs realize?
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To the extent possible, the Landlord Incentives Evaluation will address these research questions using administrative data that PHAs already prepare and submit to HUD on a regular basis. This includes data from HUD’s Inventory Management System, which captures data on the characteristics of units subsidized through the program; the MTW Supplement, in which PHAs in the Landlord Incentive cohort report on their activities related to landlord incentives; and HUD’s Voucher Management System, which collects information on housing subsidies.

In addition to administrative data, the evaluation requires modest primary data collection from PHAs and landlords. This information will: (1) clarify and expand upon administrative data and other secondary sources; (2) provide qualitative insights into the experiences of landlords and PHAs to inform the process study; and (3) provide context for the findings of the impact and cost studies, highlighting why incentives were or were not successful in achieving HUD’s desired outcomes.

Data collection activities are expected to begin in November 2022 and continue through December 2025.

## A.2: Purpose and Users of Information

This is a new collection. HUD will use the information collected to learn about the implementation of incentives and the impacts of landlord incentives on HCV program outcomes. PHAs that are considering implementing landlord incentive programs will learn about the effectiveness of various landlord incentives. Abt Associates, the evaluation contractor, will carry out the data collection and analysis on HUD’s behalf. The data collection activities covered under this request are described in further detail below and are summarized in Exhibit 2.

### Interviews with PHAs

Abt Associates will conduct three rounds of interviews with the 28 treatment PHAs. In each round, Abt research staff will interview up to 5 staff involved in the HCV program, such as the PHA Executive Director, HCV Director, and Landlord Liaison. Each interview will take approximately one hour. The first round of interviews will be held in-person during site visits, anticipated to take place between January and April 2023. The second round of interviews will be conducted by telephone and take place in 2024. The third and final round of interviews will be held in-person during site visits and are anticipated to take place between May and December 2025.

Abt Associates will also conduct a single round of interviews with a subset of 21 of the comparison PHAs. Similar to treatment PHAs, Abt research staff will interview up to 5 PHA staff during an in-person site visit. Each interview will take approximately one hour. Comparison PHA interviews are anticipated to occur between May and December 2025, concurrently with the final round of treatment PHA interviews.

If in-person interviews are not feasible due to COVID-19 precautions – whether due to travel restrictions, PHA policies on in-person meetings, or due to participants’ own preferences – the study team is prepared to conduct interviews remotely as needed. Remote interviews with PHA staff will take place over the phone, through Microsoft Teams, or through Webex. Microsoft Teams and WebEx are secure conferencing platforms that allow us to audio record the interviews.

The overall goals of these interviews are to understand PHA staff experiences implementing the landlord incentives; to gather insights about their relationships with landlords; to understand the efforts PHA staff have made to increase landlord participation; and to learn PHA staff views on how landlord incentive efforts have influenced program outcomes. This information will be used to address the key research questions from the process study (Exhibit 1), illuminating PHAs' challenges and strategies for promoting landlord participation in the HCV program, and highlighting the contrast between landlord incentives (implemented at treatment PHAs) and standard practice (implemented at comparison PHAs). PHA interviews will also provide necessary context for collecting data and interpreting administrative and survey data in the cost and impact studies. For example, if the impact study reveals that a particular incentive was not impactful, interview data can highlight potential explanations, such as PHAs' challenges implementing the incentive.

The Abt research team has developed four separate data collection instruments for PHA interviews:

- Treatment PHA interview guide for Round 1
- Treatment PHA interview guide for Round 2
- Treatment PHA interview guide for Round 3
- Comparison PHA interview guide

### **PHA Web Surveys**

Abt Associates will field a brief online survey to all 28 treatment PHAs and 112 comparison PHAs at baseline (January 2023) and in the final year of the study (November 2025). Surveys will be sent to a single staff member at each PHA and will take approximately 30 minutes to complete. Surveys will primarily include close-ended responses to reduce respondent burden.

The goal of the surveys is to collect information about PHAs' planned or implemented incentives or other initiatives to improve landlord participation. To minimize burden, the survey will only ask for information that is not otherwise reported in secondary sources (such as HUD administrative data). For treatment PHAs, the surveys will gather details about specific incentives that are not otherwise reported in the MTW Supplement, including the timing, targeting, and number of incentives provided. For comparison PHAs, the surveys at baseline and follow-up will gather details about other efforts to increase landlord participation outside of the Landlord Incentives Cohort. The surveys will also ask about success rates and other information to support the cost and impact studies. For example, if we find that comparison PHAs adopted comparable incentives even without MTW authority, we would expect that their costs and outcomes would be more similar to treatment PHAs.

The Abt research team has developed four separate data collection instruments:

- Treatment PHA baseline survey
- Treatment PHA follow-up survey
- Comparison PHA baseline survey
- Comparison PHA follow-up survey

### **Landlord Interviews**

To better understand landlords' response to the new incentives, as well as barriers they face to HCV program participation, we will interview 400 landlords in 20 sites (13 treatment, 7 comparison). Landlord interviews will take place in-person, supplemented with telephone interviews as needed to accommodate landlords' schedules. Each interview will take approximately one hour. Landlord interviews are

anticipated to occur between May and November 2025, concurrently with the final round of interviews with treatment PHAs and comparison PHAs.

Similar to the interviews with PHA staff, if the local or national COVID-19 context prevents in-person interviews, the Abt research team is prepared to conduct interviews remotely as needed. Remote interviews with landlords will be conducted over the phone or via WebEx or Microsoft Teams.

The purpose of the interviews is to learn whether landlords are aware of various landlord incentives associated with MTW and how these changes have affected (or could affect) landlord decisions about participation in the HCV program. The interviews will help address the process study questions and will provide context for the impact study. For example, if we find that landlords were highly motivated by a certain incentive, we would expect that PHAs that implemented that incentive would have better outcomes than other PHAs.

The study team has developed two different interview guides for landlord interviews:

- Thematic interview guide
- Qualitative Impact Protocol (QuIP) guide

## Exhibit 2: Justification for Data Collection Activities

Year / Group and Mode	Respondents, Content, and Justification for Inclusion
<p><b>Treatment PHA Interviews – Round 1</b></p> <p>(In-person)</p>	<p><b>Respondents:</b> Key HCV program staff (Executive Director, HCV Director, etc.) at 28 treatment PHAs. Three to five staff per PHA.</p> <p><b>Topics:</b></p> <ul style="list-style-type: none"> <li>• Current rental market context and conditions</li> <li>• Current program performance, successes, and challenges</li> <li>• Relationship with landlords and perception of PHA among landlords</li> <li>• PHA efforts to improve landlord participation and overall program performance</li> <li>• Motivations for applying to MTW</li> <li>• Process for developing MTW Supplement</li> <li>• Anticipated impact of incentives on landlord willingness and overall program performance</li> <li>• Anticipated implications of incentives for program operations</li> <li>• PHA staffing and program implementation capacity</li> </ul> <p><b>Justification:</b> The baseline interview with treatment PHA staff is essential for collecting in-depth information on PHAs’ initial motivations for applying for MTW designation and for selecting specific incentives. It is also essential for assessing the ‘current state’ of their program prior to the implementation of the incentives. This information will be used to address key questions in the process study and to establish baseline information for the cost study. Information from the site visits will also provide contextual information to inform subsequent analyses of the impact study data.</p>
<p><b>Treatment PHA Interviews – Round 2</b></p>	<p><b>Respondents:</b> Key HCV program staff (Executive Director, HCV Director, etc.) at 28 treatment PHAs. Three staff per PHA.</p> <p><b>Topics:</b></p>

Year / Group and Mode	Respondents, Content, and Justification for Inclusion
(Telephone)	<ul style="list-style-type: none"> <li>• Changes in rental market context since baseline</li> <li>• Changes in PHA leadership or operations since baseline</li> <li>• Current program performance, successes, and challenges (including success rates)</li> <li>• PHA staffing and program implementation capacity</li> <li>• Changes to planned incentives since launch</li> <li>• Challenges in implementing incentives</li> <li>• Reactions to incentives among landlords</li> <li>• Early changes in program performance</li> <li>• Cost indicators not otherwise reported in secondary data (to inform cost study)</li> </ul> <p><b>Justification:</b> The midpoint interviews with treatment PHA staff will collect in-depth information about how incentives have been implemented, and any unexpected challenges or changes that PHAs have faced in the initial implementation. This information will be used to address key questions in the process study and provide context for the cost study and impact study analyses.</p>
<p>Treatment PHA Interviews – Round 3</p> <p>(In-person)</p>	<p><b>Respondents:</b> Key HCV program staff (Executive Director, HCV Director, etc.) at 28 treatment PHAs. Three to five staff per PHA.</p> <p><b>Topics:</b></p> <ul style="list-style-type: none"> <li>• Current rental market context and conditions</li> <li>• Current program performance, successes, and challenges (including success rates)</li> <li>• Changes from initial MTW Plan</li> <li>• PHA staffing and program implementation capacity</li> <li>• Challenges and successes in implementing landlord incentives</li> <li>• Perceived impact of incentives on landlord willingness and overall program performance</li> <li>• Implications of incentives for program operations</li> <li>• Plans for close-out of incentives</li> </ul> <p><b>Justification:</b> The final round of interviews with treatment PHA staff are essential for collecting more in-depth information on PHAs’ experiences implementing the incentives, any challenges they have faced or lessons learned, and their reflections on the impacts of the incentives on program performance. This information is critical for the process study and will also lend context to the impact and cost studies, allowing HUD to better understand why the incentives did or did not lead to greater landlord participation. Given the expected small, expected change in landlord participation, these studies will help tease out deeper understanding of the degree to which PHA incentives may act as facilitators and barriers to engaging landlords in the HCV program.</p>



Year / Group and Mode	Respondents, Content, and Justification for Inclusion
<p><b>Comparison PHA Interviews</b></p> <p><b>(In-person)</b></p>	<p><b>Respondents:</b> Key HCV program staff (Executive Director, HCV Director, etc.) at 21 comparison PHAs. Three to five staff per PHA.</p> <p><b>Topics:</b></p> <ul style="list-style-type: none"> <li>• Current rental market context and conditions</li> <li>• Current program performance (including success rates)</li> <li>• Staffing and program implementation capacity</li> <li>• Relationship with landlords and perception of PHA among landlords</li> <li>• PHA efforts to promote landlord participation and improve overall program performance</li> <li>• Comparable incentives offered without MTW authority</li> <li>• Perceived impacts of incentives on program performance</li> </ul> <p><b>Justification:</b> Even without MTW authority, many PHAs have implemented new programs or policies designed to attract or retain landlords in the HCV program. Interviews with comparison PHAs will provide insight into the “usual practice” of PHAs absent MTW authority. The information is necessary for addressing the process study questions and will also provide context for the impact and cost studies. Understanding the characteristics of programs in the comparison group is critical to enabling the impact study team to assess why they may or may not see any differences between the treatment and comparison groups.</p>
<p><b>Treatment PHA Survey - Baseline</b></p> <p><b>(Internet)</b></p>	<p><b>Respondents:</b> HCV Director or equivalent at 28 treatment PHAs.</p> <p><b>Topics:</b></p> <ul style="list-style-type: none"> <li>• Confirmation of current success rate</li> <li>• Number of units available to voucher tenants</li> <li>• Current challenges in recruiting or retaining landlords</li> <li>• Planned MTW incentives or other efforts to increase landlord participation</li> </ul> <p><b>Justification:</b> The main purpose of the baseline survey of treatment PHAs is to capture information on incentives and program performance that is not otherwise available from administrative sources, including the number of units available to voucher holders (i.e. advertised in PHA-managed listings) and the timing of planned incentives. The survey will also gather information on PHA relationships with landlords and any efforts to increase landlord participation, including any incentives that could be comparable to those offered under MTW. This information will inform the cost and impact studies, allowing for baseline information for the cost study and providing contextual information for sampling frames for the impact study. The survey will be fielded prior to site visits, so information about incentives will also be used to tailor the interviews with PHA staff.</p>

Year / Group and Mode	Respondents, Content, and Justification for Inclusion
<p><b>Treatment PHA Survey – Follow-up</b></p> <p>(Internet)</p>	<p><b>Respondents:</b> HCV Director or equivalent at 28 treatment PHAs.</p> <p><b>Topics:</b></p> <ul style="list-style-type: none"> <li>• Confirmation of success rates</li> <li>• Number of units available to voucher tenants</li> <li>• Cost data not otherwise collected in administrative data</li> <li>• MTW incentives offered or other efforts to increase landlord participation</li> </ul> <p><b>Justification:</b> The main purpose of the follow-up survey of treatment PHAs is to capture information on incentives and program performance that is not otherwise available from administrative sources, including the number of units available to voucher holders (i.e. advertised in PHA-managed listings) and certain indicators of cost for specific incentives. This information will inform the cost and impact studies. The survey will be fielded prior to site visits, so it will also be used to identify potential interviewees and coordinate scheduling for site visits. In addition it will provide preliminary data that will be used in planning site visits to focus interview questions.</p>
<p><b>Comparison PHA Survey – Baseline</b></p> <p>(Internet)</p>	<p><b>Respondents:</b> HCV Director or equivalent at 112 comparison PHAs.</p> <p><b>Topics:</b></p> <ul style="list-style-type: none"> <li>• Confirmation of current success rate</li> <li>• Number of units available to voucher tenants</li> <li>• Challenges in recruiting or retaining landlords</li> <li>• Comparable incentives offered or other efforts to increase landlord participation</li> </ul> <p><b>Justification:</b> The purpose of the baseline survey of comparison PHAs is to collect information that will allow the study team to compare the experiences of PHAs with and without MTW authority. The survey will gather information on PHA relationships with landlords and any efforts to increase landlord participation, including any incentives that could be comparable to those offered under MTW. The survey will also gather information on the number of units available to voucher holders (i.e. advertised in PHA-managed listings). This information will address key process study questions and is necessary for establishing a meaningful set of cost and impact study data for the comparison sites.</p>
<p><b>Comparison PHA Survey – Follow up</b></p> <p>(Internet)</p>	<p><b>Respondents:</b> HCV Director or equivalent at 112 comparison PHAs.</p> <p><b>Topics:</b></p> <ul style="list-style-type: none"> <li>• Confirmation of current success rate</li> <li>• Number of units available to voucher tenants</li> <li>• Challenges recruiting or retaining landlords during the study period</li> <li>• Comparable incentives offered or other efforts to increase landlord participation during the study period</li> </ul> <p><b>Justification:</b> The purpose of the follow-up survey of comparison PHAs is to collect information that will allow the study team to compare the experiences of PHAs with and without MTW authority. The survey will gather information on PHAs' experiences with landlord participation and any efforts to increase landlord participation during the study period, including any incentives that could be comparable to those offered under MTW. This information will address key process study questions and is necessary for establishing a meaningful set of cost and impact study data for the comparison sites.</p>

Year / Group and Mode	Respondents, Content, and Justification for Inclusion
<p><b>Landlord Thematic Interviews</b></p> <p>(In-person or Phone/Web Conference)</p>	<p><b>Respondents:</b> Landlords and property managers with available rental units within each PHA catchment area. For treatment PHAs this will include 1) landlords who rented to HCV families prior to incentives; 2) landlords who rented to HCV families only have incentives; 3) landlords who do not rent to HCV families. For comparison PHAs this will include 1) landlords who rent to HCV families; 2) landlords who do not rent to HCV families.</p> <p><b>Topics:</b></p> <ul style="list-style-type: none"> <li>• Business strategies and motivation for real estate investment</li> <li>• Experience with and knowledge of HCV program</li> <li>• Incentives and barriers to HCV participation</li> <li>• Experience with and knowledge of landlord incentives</li> </ul> <p><b>Justification:</b> The purpose of these in-depth interviews is to understand landlords' motivation for participation in the HCV program and the role of PHA incentives in their decision making (if any). The interviews will allow the research team to understand landlord perspectives and business decisions and how they operate in different markets and social networks. These data will be critical in understanding the mechanisms by which the incentives shifted participation (or failed to do so), permitting accurate interpretations of the impact study.</p>
<p><b>Landlord QulP Interviews</b></p> <p>(In-person or Phone/Web Conference)</p>	<p><b>Respondents:</b> Landlords and property managers with available rental units within each treatment PHA catchment area. This will include 1) landlords who rented to HCV families prior to incentives; 2) landlords who rented to HCV families only have incentives; 3) landlords who do not rent to HCV families.</p> <p><b>Topics:</b></p> <p>Topics explored will look for changes within the intervention window (2022-2025) in the following areas to see if respondents organically mention the incentives without specific probing about the HCV program:</p> <ul style="list-style-type: none"> <li>• Business income and expenses</li> <li>• Risk management</li> <li>• Rental decisions including subsidized renters receiving HCV</li> <li>• Relationship and experiences with different kinds of renters including subsidized renters receiving HCV</li> <li>• Relationship with the PHA</li> <li>• Marketing of available units</li> </ul> <p><b>Justification:</b> The purpose of the QulP interviews is to establish whether, as a result of the MTW incentives, landlords have made different decisions in any areas of their rental business. The QulP uses a specific methodological approach that keeps interviewees blinded; they do not know what the intervention being studied is. From the changes—positive or negative—reported by landlords as resulting from a landlord incentive, the team can explore the perceived impact of the landlord incentives, if any, on landlord decision-making. This data will allow the Abt research team to assess impact through a methodological approach parallel to the quasi-experimental impact study.</p>

### **A.3: Use of Information Technology**

In accordance with the E-Government Act of 2002, information technology has been incorporated into the data collection to reduce respondent burden. Electronic mail will be used, whenever possible, to communicate with PHAs and landlords to request their participation in interviews. In addition, we will use Calendly – an online scheduling tool – to allow landlords and PHA staff to quickly find an interview time that works for their schedule, minimizing the need for additional emails.

Interviews with PHAs and landlords will primarily be conducted in-person, with one round of treatment PHA interviews taking place by phone. With participants' permission, interviewers will audio-record all interviews so that the interviewer can fully focus on conducting the interview without pauses or delays for notetaking. If in-person data collection is not feasible due to travel restrictions or health risks posed by the COVID-19 pandemic, the Abt research team is prepared to conduct all interviews remotely. Remote interviews will either take place over the phone or through Webex or Microsoft Team, secure web conferencing platforms, depending on the participants' preferences.

PHA surveys will be completed online using ConfirmIT, a user-friendly survey application. Respondents will receive a link to the survey via email and enter their responses directly into the survey. To reduce participant burden, to the extent possible, surveys will be pre-populated with information from administrative sources (for example, using PIC/IMS data to pre-populate the PHA name and success rate, and using text responses from the baseline survey to pre-populate text fields in the follow-up survey).

### **A.4: Efforts to Identify Duplication**

As part of the design process for the study, Abt Associates conducted a review of literature regarding the HCV program. No studies were identified that involved discussions with landlords regarding landlord incentive programs except in the mobility program context. HUD is unaware of any other studies for which this study represents a duplicate research effort.

The Abt research team also reviewed existing sources of secondary data for PHAs (such as IMS/PIC data and the template for MTW Supplements) prior to designing the PHA surveys. The surveys are designed to capture information that is not otherwise available in these secondary sources.

### **A.5: Involvement of Small Organizations**

This data collection effort may include interviews with landlords who are owners of rental properties, and these owners could include small property ownership entities. However, this is a voluntary interview and interviews have been designed to minimize burden. Landlords will have the option to participate in-person at a location convenient to the landlord or by phone. Interviews will be audio-recorded to minimize disruptions or delays for note-taking. At most, 400 landlords will participate in the data collection and each participant will be given \$50 as a token of appreciation for their participation.

### **A.6: Consequences of No or Less Frequent Data Collection**

This data collection effort will only be conducted once and under specific contract guidelines. Without the data collection activities described in this statement, HUD would have incomplete information to evaluate the effectiveness of landlord incentives on program outcomes. If the data collection activities described in this statement are not approved, the evaluation of the Landlord Incentives Cohort would rely only on secondary data sources (such as HUD administrative data) to address the research questions.

These secondary sources could help HUD determine *whether* landlord incentives led to improved program outcomes; however, without primary data collection, it would be impossible to determine *why* they were successful, which is one of the key goals of this research. A full assessment of the use of landlord incentives is crucial as HUD considers how to improve success rates in the HCV program.

## A.7: Special Circumstances

The proposed data collection activities are consistent with the guidelines set forth in 5 CFR 1320.6 (Controlling Paperwork Burden on the Public – General Information Collection Guidelines). As noted below, there are no special circumstances that require deviation from these guidelines.

- **Requiring respondents to report information to the agency more than quarterly:** Respondents are not required to report information more than quarterly.
- **Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it:** Respondents are not required to prepare a written response as part of this data collection effort.
- **Requiring respondents to submit more than an original and two copies of any document:** Respondents are not required to submit any documents as part of this data collection effort.
- **Requiring respondents to retain records other than health, medical, government contract, grant-in-aid, or tax records for more than three years:** Respondents are not required to retain records as part of this data collection effort.
- **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:** The surveys to PHAs are designed to produce results that can be generalized to the broader universe of the study.
- **Requiring the use of a statistical data classification that has not been reviewed and approved by OMB:** This data collection does not involve the use of any statistical data that would not be reviewed and approved by OMB.
- **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:** This data collection does not involve the use of a pledge of confidentiality that would deviate from statute or regulation, be inconsistent with disclosure and data security policies, or be considered as impeding the sharing of data as appropriate.
- **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:** This data collection does not require respondents to submit proprietary trade secrets or confidential information. Any such information would be kept confidential to the extent permitted by law.

## A.8: FRN and Consultation

### Federal Register Notice and Comments

In accordance with 5 CFR 1320.8 (Paperwork Reduction Act of 1995), HUD published a 60-Day Notice of Proposed Information Collection in the Federal Register on August 1, 2022 (Docket No. FR-7060-N-04, pages 46991 - 46992). The notice provided a 60-day period for public comments, and comments were due September 30, 2022. (See Attachment 03 for a copy of the 60-Day Notice of Proposed Information Collection.) No comments were received.

### Consultation with Experts

The Landlord Incentives Evaluation was developed and is being implemented by Abt Associates Inc., HUD's contractor. Key members of the Abt research team include Co-Principal Investigators Dr. Laura Peck and Dr. Larry Buron; Project Director Dr. Meryl Finkel; Project Quality Advisor Dr. Jill Khadduri; Director of Quantitative Analysis Dr. Judy Geyer; and Director of Qualitative Analysis Dr. Hannah Thomas. Abt has also engaged Dr. Phillip Garboden of the University of Hawai'i to support data collection and analysis tasks. Staff from HUD's Office of Policy Development and Research and Office of Public and Indian Housing have collaborated with the Abt research team on study design and data collection plan.

### Consultation with a Resident Expert Panel

In addition to the core study team described above, the study will also involve consultation with a Resident Expert Panel (REP). The role of the REP is to ensure that the research approach considers the perspectives, priorities, and experiences of people who are served by the HCV program. The REP will include six members who have experience as users of the HCV program, recruited from two organizations that have relationships with members of the Abt Associates research team. We will convene the REP in a workshop format at 10 critical points throughout the study to provide feedback on research questions and outcome measures, landlord interviews, data collection processes, interim reports, special topic analyses, evaluation findings, and the final report. REP members will receive a \$50 honorarium per workshop (with a total of ten workshops), plus an additional honorarium of \$175 for those who attend all 10 sessions to incentivize retention.

## A.9: Payment of Respondents

Landlords will receive \$50 as a token of appreciation for participating in an interview. The landlord payment amount is based on previous landlord interview projects<sup>1</sup> that determined that \$50 indicated appropriate respect for the respondent's time while not presenting a coercive influence on their decision to participate. PHA staff will receive no payment for participating in interviews or completing surveys.

## A.10: Assurances of Confidentiality Provided to Respondents

HUD has entered into a contract with an independent research team, Abt Associates, to conduct this research effort. HUD and Abt Associates will make every effort to maintain the privacy of respondents. 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.

Research reports may name specific PHAs that were included in the study, for example, to highlight a unique practice or program. However, individual PHA staff members who participate in interviews will not be named in reports. PHA staff members will be informed that, although they will not be named directly in any publications, they may be identifiable based on their affiliation with a specific PHA.

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<sup>1</sup> Garboden, P. M., & Rosen, E. (2018). Talking to landlords. *Cityscape*, 20(3), 281-291

All respondents included in the interviews will be asked if they consent to participate. They will also be made aware that the information they provide will be used only for research purposes.

### **A.11: Sensitive Questions**

The data collection instruments do not contain any sensitive questions. We are not asking for financial information or for any other personal and sensitive information.

### **A.12: Estimation of Information Collection Burden**

Exhibit 3 presents the estimated annualized respondent burden for this information collection. The burden estimates are inclusive of PHA surveys, PHA interviews, and landlord interviews. Although the data collection instruments for each of these activities varies slightly between treatment/comparison groups and between baseline and follow-up time periods, we anticipate that the burden will be similar within each category.

**Exhibit 3: Estimated Respondents, Burden Hours, and Costs**

Information Collection	Assumption	Estimated Respondents	Frequency of Response	Responses per Annum	Burden Hours per Response	Annual Burden Hours	Hourly Cost per Response	Annual Cost
Baseline 05_Web Survey Treatment PHA 10.05.2022  06_Baseline Web Survey Comparison PHA 10.05.2022	All PHAs	140.00	0.33	46.67	0.50	\$23.33	\$54.96	\$1,282.43
09_Baseline Site Visit Interviews Y2 10.05.2022	29 PHAs, 4 interviews per PHA	112.00	0.33	37.33	1.00	\$37.33	\$54.96	\$2,051.88
10_Phone Interviews Y3 10.05.2022	29 PHAs, 3 interviews per PHA	84.00	0.33	28.00	0.75	\$21.00	\$54.96	\$1,154.18
07_Follow-up Web Survey Treatment PHA 10.05.2022  08_Follow-up Web Survey Comparison PHA 10.05.2022	All PHAs	140.00	0.33	46.67	0.50	\$23.33	\$54.96	\$1,282.43
11_Follow-up Site Visit Interviews Treatment PHA Y5 10.05.2022  12_Follow-up Site Visit Interviews Comparison PHA Y5 10.05.2022	50 PHAs, 4 interviews per PHA	200.00	0.33	66.67	1.00	\$66.67	\$54.96	\$3,664.07
14_Landlord Interviews TIA 10.05.2022  15_Landlord Interviews QulP 10.05.2022	All landlords	400.00	0.33	133.34	1.00	\$133.34	\$35.20	\$4,693.43
<b>Total Annual Cost</b>								<b>\$14,128.42</b>
<b>Total Cost for 3 Years</b>								<b>\$42,385.25</b>

Total burden annualized over 3-year period, anticipated January 2023 – November 2025.



The average hourly rate for Landlords (\$35.20) is based on the average hourly rates for Property, Real Estate, and Community Association Managers (Source: [Bureau of Labor Statistics, May 2020 National Occupational Employment and Wage Estimates.](#))

The average hourly rate for PHA staff (\$54.96) is based on the average employer costs for State and Local Government employees (Source: [Bureau of Labor Statistics, December 2021 Employer Costs for Employee Compensation](#))

### **A.13: Cost Burden to Respondents or Record Keepers**

This data collection effort involves no recordkeeping or reporting costs for respondents other than the time burden to respond to questions during the interview described in item A.12 above.

### **A.14: Estimate of Cost to the Federal Government**

The current effort is being carried out under a HUD contract with Abt Associates. HUD estimates the costs to the Federal government for this data collection and analysis of these data to be approximately \$768,152.20 per year for five years. The professional labor cost estimates for this information collection include project management staff, data analysts, survey methodologists, interviewers, and IT support staff. Exhibit 4 summarizes the cost breakdown per year.

#### **Exhibit 4: Estimated Costs Per Year**

<b>Activity</b>	<b>Estimated Cost to Federal Government</b>	<b>Total Labor Hours for Information Collection</b>
Professional labor	\$763,342.20	4,296.6 hours
Landlord token of appreciation or other direct costs	\$4,000	N/A
REP payment	\$810	N/A
Total	\$768,152.20	4296.6 hours

### **A.15: Reasons for Change in Burden**

This submission to OMB is a new request for approval.

### **A.16: Plan for Tabulation, Statistical Analysis, and Publication**

Abt Associates will analyze, tabulate, and report the data collected for the Landlord Incentives Evaluation to HUD. Exhibit 5 presents an overview of the data collection and analysis schedule. This schedule assumes that data collection begins in November 2022.

#### **Exhibit 5: Data Collection Timeline**

Activity	Treatment	Comparison	In-Depth Comparison
Sample	28 PHAs	112 PHAs	22 PHAs
<b>Year 1</b>			
Secondary Data	ü	ü	ü
<b>Year 2</b>			
Secondary Data	ü	ü	ü
PHA Data	Site Visits	Web Survey	Web Survey
<b>Year 3</b>			
Secondary Data	ü	ü	ü
PHA Data	Phone Interviews		
<b>Year 4</b>			
Secondary Data	ü	ü	ü
PHA Data	Site Visits	Web Survey	Site Visits
Cost Data	Site Visits		Site Visits
Thematic Landlord Data Collection	Interviews, Observations in 6 PHA jurisdictions		Interviews, Observations in 4 PHA jurisdictions
QuIP Landlord Data Collection	Interviews, Observations in 6 PHA jurisdictions		Interviews, Observations in 4 PHA jurisdictions
<b>Year 5</b>			
Secondary Data	ü	ü	ü

### **A17: Reasons not to Display OMB Expiration Date**

HUD does not seek approval to avoid displaying the expiration date. All data collection instruments will prominently display the expiration date for OMB approval.

### **A18: Exceptions to Certification for Paperwork Reduction Act Submissions**

No exceptions are necessary for this information collection.