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

OMB Information Collection Request

0970 - 0628

Supporting Statement Part A - Justification

January 2025

**Type of Request:** Revision

Submitted By:

Office of Community Services

Administration for Children and Families

U.S. Department of Health and Human Services

**Summary**

The Office of Community Services (OCS), Administration for Children and Families (ACF), U.S. Department of Health and Human Services (HHS), is requesting approval of revisions to a recently approved information collection for three years: Office of Community Services Affordable Housing and Supportive Services Demonstration (Office of Management and Budget #: 0970-0628; Expiration Date:  9/30/2024).  This information collection was originally approved for 6 months as an emergency approval to satisfy a request in House Report 117-403 for a report on the results of the demonstration within one year of the award of grants for the program.

OCS requests to extend the approval in order to continue reporting on the findings of the demonstration program, monitoring program performance, and supporting program improvement. The program received additional appropriations in FY 2024.

In addition to extending the approval, OCS seeks to update the burden estimates to accommodate an anticipated increase in the number of grant recipients, as well as to collect additional follow-up responses to the instruments examining service receipt and self-sufficiency for individuals.  Finally, OCS has made updates to approved forms in order to accommodate the universe of future grant recipients and in response to feedback received during the 60-day comment period.

1. **Circumstances Making the Collection of Information Necessary**

In Fiscal Year (FY) 2023, the Office of Community Services (OCS) began administering a brand-new demonstration program entitled the Affordable Housing and Supportive Services Demonstration (AHSSD). This program was appropriated in HR 117-403, Departments of Labor, Health and Human Services, and Related Agencies Appropriations Bill, 2023 through the Social Services Research Demonstration program (SSRD). OCS awarded grants for the AHSSD on September 29, 2023, and prepared data collection instruments to study the implementation and outcomes of this program with the intent to produce robust reporting on the results of the demonstration. The House report language directs the Administration for Children and Families (ACF) to provide “a report one year after the award of such grants on the findings of this demonstration program.” In order to meet this deadline, OCS sought and received emergency approval to collect information needed to prepare this report.

Subsequently, the Departments of Labor, Health and Human Services, and Education, and Related Agencies Appropriations Act of 2024 funded all demonstration programs included under the SSRD heading in House Report 117-403.

The first report to the House Committee on Appropriations is in production, and continued data collection will support follow up reports. As such, OCS is now requesting an extension in order to continue data collection to report on the results of this demonstration program and a revision to better accommodate future grant recipients.

This collection is also critical to OCS’s mission of alleviating the causes and conditions of poverty for individuals, families, and communities with low incomes. Through program evaluation, OCS will be able to study the implementation of this brand-new program that provides supportive services to families living in affordable housing. The results of this study will not only inform members of Congress but will also help OCS shape and refine our program model to better serve beneficiaries.

1. **Purpose and Use of the Information Collection**

This information collection informs Congress on the findings of this brand-new AHSSD. A preliminary report to the House Committee on Appropriations is in production and centers on grant recipient approaches to the program, early implementation activities, and service delivery. Additionally, OCS has used data from the current collection of quarterly narrative performance progress reports and semi-annual quantitative reports to monitor program performance and inform training and technical assistance provided to grant recipients. We will continue to use this information to inform future programming.

Follow up reporting will center around three primary research categories: the implementation of supportive services in an affordable housing context; changes in residents’ ability to access needed services; and participants’ experiences and self-sufficiency outcomes. OCS hopes to identify which services and combinations of services support residents’ mental health, safety, parenting skills, housing stability, and economic mobility. OCS will also use the data collected to monitor program performance, inform technical assistance to grant recipients, and determine program best practices.

Beneficiary-level data will be used to determine how the program changed residents’ level of access to services and what outcomes were achieved by strengthening service delivery. OCS will examine how services and dosage of services are associated with the achievement of outcomes for individuals enrolled in the study. Data from program staff will be used to understand implementation of the program, including the strategies grant recipients employed to expand and strengthen services, challenges encountered, program adaptations, and promising practices.

OCS will administer some aspects of the data collection through virtual interviews and electronic surveys. OCS will also collect project updates and administrative data via quarterly narrative project performance reports in addition to semi-annual quantitative reports. For the quantitative reports, OCS has two versions—1) the original 2023 version of forms for grant recipients using FY 2023 funds, and 2) the revised 2024 version of forms for grant recipients using FY 2024 or later funds. The following table provides an overview of the information collection efforts.

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| --- | --- | --- |
| ***Instruments*** | ***Respondent, Content, Purpose of Collection*** | ***Mode and Duration*** |
| Self-Sufficiency Matrix | **Respondents:** Residents living in affordable housing complexes funded by the AHSSD grant and receiving intensive case-management services.  **Content:** Assessment of need in 18 different domains, on a scale from 1 to 5.  **Purpose:** Determine baseline needs. Assess changes in self-sufficiency caused by wraparound services. | **Mode:** Survey  **Duration:** 1.5 hours |
| Service Receipt Questionnaire | **Respondents:** Residents living in affordable housing complexes funded by the AHSSD grant and receiving intensive case-management services.  **Content: A** yes/no checklist about different services that the resident may have received in the last 6 months.  **Purpose:** Evaluate if AHSSD funding increased the number of services that residents accessed. | **Mode:** Survey  **Duration:** 15 minutes |
| Resident Interviews | **Respondents:** Residents living in affordable housing complexes funded by AHSSD grant.  **Content:** Several questions (with optional probes for more detail) regarding which services the residents used, what they found most helpful, what the role of the caseworker was, and how their families and neighbors have changed since the grant began.  **Purpose:** Understand the experiences of residents in the program, including what benefits families identify and what aspects of the program are viewed as most critical to driving positive change. | **Mode:** Interview  **Duration:** 1.5 hours |
| Quarterly Narrative Performance Progress Report (PPR) Collections | **Respondents:** Grant recipient staff.  **Content:** Narrative report on accomplishments and challenges experienced by the grant recipients.  **Purpose:** Allow OCS program specialists to provide technical assistance to grant recipients. Support understanding of implementation best practices. | **Mode:** Written report  **Duration:** 2 hours |
| 2023 Version – Semi-Annual Quantitative Report MANDATORY | **Respondents:** Grant recipient staff for projects receiving FY 2023 funds opting to use the original version.  **Content:** Count of the direct services that the grant recipient provided using AHSSD funds, count of referrals of residents to other services, characteristics of the housing complex, list of partner organizations that the grant recipient worked with, and aggregate demographics of residents who received AHSSD-funded services.  **Purpose:** Understand what AHSSD funds were used for and who was served by the grant. | **Mode:** Written report  **Duration:** 3 hours |
| 2024 Version – Semi-Annual Quantitative Report MANDATORY | **Respondents:** Grant recipient staff for projects receiving newly awarded funds and for projects receiving FY 2023 awards opting to use the revised form.  **Content:** Count of the direct services that the grant recipient provided using AHSSD funds, count of referrals of residents to other services, characteristics of the housing complex, list of partner organizations that the grant recipient worked with, and aggregate demographics of residents who received AHSSD-funded services.  **Purpose:** Understand what AHSSD funds were used for and who was served by the grant. | **Mode:** Written report  **Duration:** 3 hours |
| 2023 Version – Semi-Annual Quantitative Report OPTIONAL | **Respondents:** Grant recipient staff for projects receiving FY 2023 funds opting to use the original version.  **Content:** Count of events that the grant recipient hosted. Count of safety, stability, well-being, and economic mobility outcomes, with options for grant recipients to submit additional outcomes that they are tracking.  **Purpose:** Provide a space for grant recipients to offer details about outcomes produced by their programs that would not otherwise be collected. | **Mode:** Written report.  **Duration:** 3 hours |
| 2024 Version – Semi-Annual Quantitative Report OPTIONAL | **Respondents:** Grant recipient staff for projects receiving newly awarded funds and for projects receiving FY 2023 awards opting to use the revised form.  **Content:** Count of events that the grant recipient hosted. Count of safety, stability, well-being, and economic mobility outcomes, with options for grant recipients to submit additional outcomes that they are tracking.  **Purpose:** Provide a space for grant recipients to offer details about outcomes produced by their programs that would not otherwise be collected. | **Mode:** Written report.  **Duration:** 3 hours |
| Interviews with Program Directors | **Respondents:** Grant recipient program directors directly involved in planning or implementing the AHSSD program.  **Content:** Background of respondent, context of implementation, implementation details, and perceived outcomes of the program.  **Purpose:** Understand the design and implementation of the program to develop implementation best practices. | **Mode:** Interview  **Duration:** 1.5 hours |
| Interviews with Caseworkers | **Respondents:** Grant recipient caseworkers who provided services to residents.  **Content:** Background of respondent, implementation of services, and perceived outcomes.  **Purpose:** Understand the implementation and perceived benefits of the program from the staff perspective. | **Mode:** Interview  **Duration:** 1 hour |

1. **Use of Improved Information Technology and Burden Reduction**

OCS will make use of virtual platforms to reduce collection burden. OCS will use a virtual meeting platform, such as Microsoft Teams, to conduct virtual interviews and will transcribe responses. OCS will use a virtual survey platform, such as Qualtrics, to provide grant recipients the tools to administer two instruments – Instrument 1: Self-Sufficiency Matrix and Instrument 2: Service Receipt Questionnaire. The virtual survey platform will allow for the instruments to be administered on any mobile device in addition to a laptop or desktop computer, which will aid in survey dissemination. Once responses are submitted via the survey platform, OCS will automatically have access to the data, eliminating any potential data submission burden on grant recipients or partners.

1. **Efforts to Identify Duplication and Use of Similar Information**

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

Furthermore, the Semi-Annual Quantitative Report is based on the existing CSBG reporting structure that the grant recipients, all CSBG-funded entities, are using. Generally, the CSBG reporting structure captures a broad array of grant recipient activities and outcomes, as CSBG is a very flexible funding stream. The 2023 Version – Semi-Annual Quantitative Report streamlined the CSBG reporting form to tailor it to the grant recipients’ activities and reduce burden. Given the additional appropriations for the program, OCS has developed a revised 2024 Version – Semi-Annual Quantitative Report that draws more fully on the universe of CSBG reporting indicators to accommodate a potentially more diverse range of activities from future grant recipients. The revised form will be optional for activities funded with FY 2023 awards, but all projects using FY 2024 or later awards for services will be required to use it. All of the grant recipients have management information systems (MIS) designed to collect most of the information included in this report. OCS is thus reducing the burden of creating a new data collection system on the grant recipients, while directly discerning how AHSSD funds are being spent to increase access for residents.

1. **Impact on Small Businesses or Other Small Entities**

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

1. **Consequences of Collecting the Information Less Frequently**

AHSSD grant recipients are launching new demonstration programs. Information is emergent about how the programs are performing, the challenges they are encountering, and practices that are promising are critical to understand. OCS has requested quarterly narrative performance progress reports and semi-annual quantitative reports on service delivery so that we can provide timely information to Congress as well as timely training and technical assistance to grant recipients. Less frequent reporting may result in delayed reporting and missed opportunities for the provision of timely training and technical assistance.

1. **Special Circumstances Relating to the Guidelines of 5 CFR 1320.5**

OCS has not updated the race and ethnicity items in the 2023 Version – Semi-Annual Quantitative Report Mandatory Form or the 2024 Version – Semi-Annual Quantitative Report Mandatory Form to reflect the new standards outlined in Statistical Policy Directive 15: Standards for Maintaining, Collecting, and Presenting Federal Data on Race and Ethnicity (SPED 15). Grant recipients using the FY 2023 form have already fielded enrollment forms with the former reporting structure to current participants. As a result, we anticipate data utility issues when combining data from grant recipients using the 2023 and 2024 versions of the form as it will be difficult to aggregate across reporting formats for individuals who are receiving services at the same point in time. We also anticipate data quality issues may emerge if we transition existing grant recipients to the new reporting form. First, the grant recipients would need to field the race and ethnicity items to participants again, but they have already completed the enrollment process for these individuals. Collecting this data outside of the existing enrollment process may lead to more missing data and higher rates of error. Second, grant recipients will need to manage their pre-existing race and ethnicity data in the 2023 format alongside data that is formatted to meet the new standard. It may be difficult to update management information systems to accurately capture the data in the new format.

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

In accordance with the Paperwork Reduction Act of 1995 (Pub. L. 104-13) and Office of Management and Budget (OMB) regulations at 5 CFR Part 1320 (60 FR 44978, August 29, 1995), ACF published a notice in the Federal Register announcing the agency’s intention to request an OMB review of this information collection activity. This notice was published on June 12, 2024, 89 FR 49878) and provided a sixty-day period for public comment.

During the notice and comment period, we held a listening session with grant recipients on July 17, 2024. We have included notes outlining key points from the listening session in the appendix. Most feedback concentrated on the 2024 Version - Semi-Annual Quantitative Report Form. An overview of the feedback and OCS responses follows.

* On the form, grant recipients requested clearer instructions on who should be included in reporting for different types of fields in the report, such as when to include household members in service delivery counts and when to count eligible residents, residents receiving services, and residents receiving intensive services. OCS has added clarifying language on all tabs of the reporting forms to clarify the individuals included in each field. Per the request of grant recipients, we have also provided guidance on when figures should align.
* Grant recipients also noted that some indicators could benefit from clearer definitions. OCS reviewed items and added clarifying language to items throughout the report. Grant recipients identified some items as potentially difficult to distinguish from one another. As a result, OCS has removed some items or added language to clarify how the items are distinct.
* Grant recipients also noted that the form does not fully capture service delivery when requesting only counts of individuals served, especially with respect to casework, which often involves extensive background work that is not necessarily reflected in a session. OCS added an item to the quarterly narrative report to allow grant recipients space to describe the scope of case management. We have also added fields to capture distinct aspects of casework in subsections of the service delivery tab of the form.
* Grant recipients also noted uncertainty with how to handle the partnership start date on the partnership tab. OCS has provided additional fields to allow for the distinction between pre-existing and new partnerships and reporting of precise dates for new partners only.
* While some comments did not result in changes, such as some duplication in items, OCS is addressing the majority of comments by revising indicators, providing additional clarity in the instructions tab, and further defining parameters.

OCS also conducted an internal review of the instruments during the comment period based on what we have learned from analyzing preliminary data. Through this process we identified minor typographical errors or items that could benefit from clearer wording. In addition, we made changes to clarify reporting for grant recipients. In addition to the changes to the 2024 Version – Semi-Annual Quantitative Report and the Quarterly Narrative Project Performance Report described above, we aligned the service categories in the partnerships and events tabs with the service categories elsewhere in the report to make crosswalks between activities clearer. We also ensure the form flexibly accommodates reporting quarters across cohorts by asking the grant recipient to supply the dates for the quarter for each entry and requesting cumulative information to align with other items in the form. For the optional report on the outcomes tab, we added an indicator to track the number of individuals receiving services to support each outcome to better contextualize the number of individuals achieving that outcome.

We made additional changes to interview and focus group instruments. These changes seek to make the items more interpretable to diverse audiences as we have learned that our program houses a large variety of populations and service strategies. In the focus groups, we sought to broaden the questions to include perspectives on how and when people learn about services and perspectives on how the services meets the community’s needs. In the staff interviews, we added items to understand how residents are prioritized for services and how residents transition to or from services in the housing community. We have also included items to better understand which needs in the community present the greatest barriers to self-sufficiency and how caseworkers are addressing these needs in the program.

We have also added a few items to explore issues important to our grant recipients, including an item in the staff interview guide to understand sustainability and the sufficiency of available services to meet needs. We have also increased the number of planned focus groups to permit us the opportunity to segment the groups to explore experiences of distinct subpopulations, such as individuals living in transitional housing and those living in permanent supportive housing. We also made minor modifications to the introductory language and study information for interview and focus group participants to make information available about the IRB and to reference transcription rather than recording.

Finally, we have modified the characteristics tab of the 2024 Version - Semi-Annual Quantitative Report form to better align with other reporting guidelines. We updated the “Gender” category to “Gender orientation” and replaced the “Other” category with “Transgender, non-binary or another gender” to align with White House SOGI Best Practices. Finally, for the age group categories, we make minor modifications to the groupings of ages to mirror common reporting formats from Census, enabling comparison of populations served to those in surrounding areas.

1. **Explanation of Any Payment or Gift to Respondents**

***NOTE:*** *There are no proposed changes to currently approved tokens of appreciation, which are described here.*

As previously approved, OCS is offering a $25 token of appreciation each time a participant completes the Arizona Self-Sufficiency Matrix and the Service Receipt Questionnaire and $50 to focus group participants as tokens of appreciation. OCS reviewed relevant literature on research participant recruitment and determined that monetary tokens of appreciation were necessary for sufficiently documenting these experiences and outcomes. A large body of research indicates that providing monetary tokens of appreciation significantly increase participation in research ([Abdelazeem et al., 2023](https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.ncbi.nlm.nih.gov%2Fpmc%2Farticles%2FPMC9844858%2F&data=05%7C02%7CJessica.Hale%40acf.hhs.gov%7Cf8bb1d80d69e497c3b9e08dcaa6a3e5c%7Cd58addea50534a808499ba4d944910df%7C0%7C0%7C638572620492590046%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=SY5A0pWebeRcHqHOCBCMPTpePYyI8W6q3SCuxg%2BxuKo%3D&reserved=0), [Edwards et al., 2002](https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.bmj.com%2Fcontent%2F324%2F7347%2F1183&data=05%7C02%7CJessica.Hale%40acf.hhs.gov%7Cf8bb1d80d69e497c3b9e08dcaa6a3e5c%7Cd58addea50534a808499ba4d944910df%7C0%7C0%7C638572620492611054%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=2Wa%2F0DZV67Mw6Voa7icFuTB14aUNxk6TLEAhRp9TNfM%3D&reserved=0), [Singer and Ye, 2012](https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fjournals.sagepub.com%2Fdoi%2F10.1177%2F0002716212458082&data=05%7C02%7CJessica.Hale%40acf.hhs.gov%7Cf8bb1d80d69e497c3b9e08dcaa6a3e5c%7Cd58addea50534a808499ba4d944910df%7C0%7C0%7C638572620492627935%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=tWQUXrRYo4sTgiOhPmRHXML2DD2DT0HuSyIEKLHvXbU%3D&reserved=0)), which can reduce non-response bias, improving the validity of study findings.  In the context of the AHSSD study, OCS determined that tokens of appreciation were necessary given the need to engage respondents from hard-to-reach populations (e.g., individuals with low incomes, see a discussion in [Singer and Ye, 2012](https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fjournals.sagepub.com%2Fdoi%2F10.1177%2F0002716212458082&data=05%7C02%7CJessica.Hale%40acf.hhs.gov%7Cf8bb1d80d69e497c3b9e08dcaa6a3e5c%7Cd58addea50534a808499ba4d944910df%7C0%7C0%7C638572620492642635%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=WFMuc8D3FG0cRvHpQME6PIg1MTxViVyJJUN4V%2BLSyfg%3D&reserved=0)) and to collect multiple waves of data when attrition may be a particular risk of nonresponse ([Yu et al., 2017](https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Fbmcmedresmethodol.biomedcentral.com%2Farticles%2F10.1186%2Fs12874-017-0353-1&data=05%7C02%7CJessica.Hale%40acf.hhs.gov%7Cf8bb1d80d69e497c3b9e08dcaa6a3e5c%7Cd58addea50534a808499ba4d944910df%7C0%7C0%7C638572620492655524%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C0%7C%7C%7C&sdata=wNWj3WPyjML3UxaZsCfJu8g36KAv2WpxTY2dECIhfjw%3D&reserved=0)). Several of the housing communities in our study provide transitional or temporary housing. As the study progresses, many individuals in the study may move out of the community and monetary tokens of appreciation may make them more likely to continue reporting outcomes for the study.

OCS also believes that by offering tokens of appreciations for the Matrix and focus groups, we will receive higher quality data, as participants will be more likely to answer thoughtfully and completely. A Cochrane systematic review and meta-analysis (Brueton et al., 2013) found that offering monetary tokens of appreciation improves the retention and response rate to questionnaires, and Stanley et al. (2020) found that monetary tokens of appreciation increase completion rates of surveys.

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

1. **Assurance of Confidentiality Provided to Respondents**

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

1. **Justification for Sensitive Questions**

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

1. **Estimates of Annualized Burden Hours and Costs**

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

* **Self-Sufficiency Matrix:** Direct beneficiaries living in the residential housing communities and receiving intensive case management will respond to the Matrix. Based on current enrollment levels, anticipated recruitment by current grant recipients, and the number of new awards, OCS anticipates that approximately 800 individuals will receive intensive case management within both Cohorts 1 & 2. OCS anticipates an overall response rate of 85% (see Supporting Statement B) and has used this response rate to calculate burden estimates. Respondents will complete the matrix every six months within the 18-month timeframe of the study, up to three times over the course of a project period. Each response is estimated to take about 1.5 hours.
* **Service Receipt Questionnaire:** The Questionnaire will be administered alongside the Matrix, to the same group of residents who are completing the Matrix. The Questionnaire will be completed on the same cadence as the matrix and will take approximately 15 minutes. OCS anticipates that approximately 800 individuals will receive intensive case management and be eligible to complete the Questionnaire. OCS anticipates an overall response rate of 85% (see Supporting Statement B) and has used this response rate to calculate burden estimates.
* **Resident Interviews:** OCS plans to interview 4 participants at each affordable housing site, for 68 interviews total. The interviews will take approximately 1.5 hours.
* **Quarterly PPR Collections:** The grant recipients will fill out a narrative PPR each quarter, for a total of 6 quarters. The form is estimated to take 2 hours to complete.
* **Semi-Annual Quantitative Report Mandatory Forms:** Projects using FY 2023 funds will have the option to use either the original or form or the revised form. Projects using FY 2024 funds will be required to use the revised form. The forms take around three hours for each recipient to compile the metrics into a single report.
  + **2023 Version:** The 2023 version is the original form. This form is completed every six months to provide information on activities in the current reporting period, for a total of 3 times over the 18-month project period. A final report with cumulative unduplicated counts is provided to cover the full project period, bringing the total number of responses to 4. We anticipate that 4 grant recipients may choose to continue using the original form. The original form is estimated to take two hours to complete.
  + **2024 Version:** The 2024 Version revises the 2023 version. This form is to be completed every six months on cumulative activities over the project period, for a total of 3 times over the 18-month project period. Because grant recipients provide cumulative reports in each report, a fourth cumulative report is unnecessary. Based on conversations with grant recipients, we believe that many current grant recipients will transition to the new form as that was the focus of most of the comments during the listening session, bringing the total number of respondents to 15. The revised form is estimated to take three hours to complete given the larger number of metrics.
* **Semi-Annual Quantitative Report Optional Forms:** Grant recipients have the option to complete some or all of this Semi-Annual Quantitative Report every six months. Projects using FY 2023 funds will have the option to use either the original 2023 version of the form or the revised 2024 version of the form. Projects using FY 2024 funds will be required to use the 2024 version of the form. For the purposes of this burden calculation, OCS is estimating that grant recipients will spend 3 hours on the report per response. OCS anticipates that only a third of grant recipients will fill out this report (see Supporting Statement B) and has used this anticipated response rate for the burden estimate.
  + **2023 Version:** The 2023 version is the original version of the form. This form can be completed every six months for the activities occurring during the six-month reporting period, as well as for the full project period in a final report, for a potential total of 4 reports. We anticipate that 1 grant recipient may opt to use the original form.
  + **2024 Version:** The 2024 version is the revised form. It can be completed every six months to provide cumulative counts of activities for a total of 3 reports. We anticipate that 5 grant recipients may opt to use the revised form.
* **Interviews with Program Directors:** OCS is planning to interview the program director at each site. This will be a one-time interview. OCS estimates that the interviews will take around 1.5 hours.
* **Interviews with Caseworkers:** OCS is planning to interview an average of 2 caseworkers per site. This will be a one-time interview. OCS estimates that the interviews will take around 1 hour.

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| Information Collection Title | Total Number of Respondents | Total Number of Responses Per Respondent | Average Burden Hours Per Response | Total Burden Hours | Annual Burden Hours | Average Hourly Wage | Total Cost | |
| Self-Sufficiency Matrix | 680 | 3 | 1.5 | 3,060 | 1,020 | $7.25 | $22,185.00 | |
| Service Receipt Questionnaire | 680 | 3 | .25 | 510 | 170 | $7.25 | $3,697.50 | |
| Resident Interviews | 68 | 1 | 1.5 | 102 | 34 | $7.25 | $739.50 | |
| Quarterly PPR Collections | 18 | 6 | 2 | 216 | 72 | $47.78 | $10,320.48 | |
| 2023 Version – Semi-Annual Quantitative Report MANDATORY | 3 | 4 | 3 | 36 | 12 | $47.78 | $1,720.08 | |
| 2024 Version – Semi-Annual Quantitative Report MANDATORY | 15 | 3 | 3 | 135 | 45 | $47.78 | $6,450.30 | |
| 2023 Version – Semi-Annual Quantitative Report OPTIONAL | 1 | 4 | 3 | 12 | 4 | $47.78 | $573.36 | |
| 2024 Version – Semi-Annual Quantitative Report OPTIONAL | 5 | 3 | 3 | 45 | 15 | $47.78 | $2,150.10 | |
| Interviews with Program Directors | 18 | 1 | 1.5 | 27 | 9 | $74.06 | $1,999.62 | |
| Interviews with Caseworkers | 36 | 1 | 1 | 36 | 12 | $56.14 | $2,021.04 | |
| **Estimated Annual Burden Total:** | | | | | **1,393** | **Estimated Annual Cost:** | **$17,285.66** |

The cost to respondents was calculated using the Bureau of Labor Statistics (BLS) wage data from May 2023. To account for fringe benefits and overhead the rate was multiplied by two. <https://www.bls.gov/oes/current/oes210000.htm>

Rationales

* For the self-sufficiency matrix, service receipt questionnaire, and focus groups, using the federal minimum wage level ($7.25).
* For quarterly PPRs and semi-annual reports, using “community and social service specialists” (21-1099) median wage rate of $23.89. To account for fringe benefits and overhead, the rate was multiplied by two, which is $47.78.
* For interviews with program directors, using “social and community service managers” (11-9151) median wage rate of $37.03. To account for fringe benefits and overhead, the rate was multiplied by two, which is $74.06.
* For interviews with caseworkers, using “social workers” (21-1020) median wage rate of $28.07. To account for fringe benefits and overhead, the rate was multiplied by two, which is $56.14.

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

There are no other costs to respondents and record keepers.

1. **Annualized Cost to the Federal Government**

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

1. **Explanation for Program Changes or Adjustments**

This request is to revise and extend approval of the data collection under OMB #0970-0628 to collect follow up data from respondents, continue monitoring progress of the program, and provide follow up reporting on the results of the demonstration. It provides revised semi-annual report forms to accommodate the universe of potential activities of future grant recipients by drawing on the full spectrum of items included in CSBG reporting, which grant recipients are required to complete as CSBG eligible entities.

1. **Plans for Tabulation and Publication and Project Time Schedule**

Data collection began in March of 2023. A preliminary report that includes tabulations of results from semi-annual report forms and analyses of narrative quarterly reports is anticipated in September of 2024. OCS plans to prepare annual reports tabulating service delivery data from the semi-annual report forms along with analyses of the matrix and service receipt questionnaire to understand the association between services and outcomes. Additionally, OCS will produce brief interim reports covering key topics related to program implementation and participant experiences using focus group and interview data. We anticipate completing reporting by September of 2027.

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

OCS will display the expiration date on OMB-approved data collections.

1. **Exceptions to Certification for Paperwork Reduction Act Submissions**

No exceptions are necessary for this information collection.

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