

**Supporting Statement for Paperwork Reduction Act Submissions**  
**Moving to Work, Asset Building Cohort Evaluation**  
**Revision to OMB # 2528-0345**

**A. Justification**

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

Moving to Work (MTW) is a HUD demonstration that allows participating Public Housing Agencies (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. The Consolidated Appropriations Act of 2016 authorized HUD to award MTW authority to 100 additional PHAs by September 2023, required that the PHAs enter the demonstration in groups that would test designated policies, and directed that the MTW expansion agencies be evaluated through rigorous research (Public Law 114-113, Section 239).<sup>1</sup> The Asset Building Cohort (ABC) includes 16 PHAs that have implemented rent reporting for credit building or an opt-out savings account.<sup>2</sup>

The Opt-out Savings Account Household Survey will determine if an opt-out savings program can be effectively implemented by PHAs and if the programs have the potential to positively impact the well-being of HUD-assisted households.

This research meets Congressional direction (see Public Law 114-113, Section 239) to use the MTW expansion to test policy innovations and it 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 evaluation includes the following components:

- 1) Program Implementation Study
- 2) Impact Studies:
  - a. Rent Reporting for Credit Building Study
    - i. Quantitative study of impact on credit scores
    - ii. Qualitative study of family experiences with rent reporting
  - b. Opt-Out Savings Account Study: Household Survey

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<sup>1</sup> Additional information about the MTW Expansion is available at:  
[https://www.hud.gov/program\\_offices/public\\_indian\\_housing/programs/ph/mtw/expansion](https://www.hud.gov/program_offices/public_indian_housing/programs/ph/mtw/expansion).

<sup>2</sup> There are 17 PHAs in the Asset Building Cohort but one of them (Sanford Housing Authority (FL016)) does not have enough assisted households to participate in an asset building program.

This Information Collection Request (ICR) focuses on 2)b. Opt-Out Savings Account Study: Household Survey. Data collection for study components 1) and 2) a. was approved in January 10, 2024 under OMB #2528-0345. This ICR is a revision to a currently approved collection, OMB #2528-0345, that was originally approved in January of 2024. Exhibit A-1 lists the survey instrument for which this submission requests approval and the already approved data collection instruments.

**Exhibit A-1. Approval of Data Collection Instruments for the Moving to Work, Asset Building Cohort Evaluation**

<b>This Request for Revision to 2528-0345 Adds the Following Instruments:</b>
Opt-out Savings Account Household Survey
Opt-out Savings Account Advance Letter
<b>Already Approved under OMB# 2528-0345 in January 2024</b>
<i>Program Implementation PHA staff interview guide</i>
<i>Program Implementation partner staff interview guide</i>
<i>Program Implementation resident interview guide</i>
<i>Rent Reporting Informed Consent Form</i>
<i>Rent Reporting Baseline Information Form</i>
<i>Rent Reporting Qualitative Interview Guide Round 1</i>
<i>Rent Reporting Qualitative Interview Guide Round 2</i>
<i>Program Implementation PHA staff interview guide-follow up</i>
<i>Program Implementation partner staff interview guide-follow-up</i>
<i>Program Implementation resident interview guide-follow-up</i>

**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.**

The data collected with the Opt-Out Savings Account Household Survey will be used to assess whether PHAs can implement opt-out savings programs and whether such programs could improve the financial well-being of HUD-assisted households. The information will be used by researchers and policymakers at HUD, in other federal agencies, and outside of the federal government, and by Congress. The purpose of the evaluation (component 2)b.) is to assess whether PHAs can implement opt-out savings programs and whether such programs could improve the financial well-being of HUD-assisted households.

Respondents are HUD-assisted households in the housing choice voucher program or the public housing program who were randomly selected to participate in the opt-out savings

program or randomly assigned to the control group. HUD-assisted households are very low-income households. Respondents do not need to travel to complete the Opt-Out Savings Account Household Survey.

- 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.**

In accord with the E-Government Act of 2002, the study uses information technology to reduce respondent burden. When possible electronic mail will be used to communicate with residents to request their participation in interviews.

Interviewers conducting the Opt-Out Savings Account Household Survey will use computer assisted personal interviewing (CAPI) technology. CAPI ensures consistent administration of the survey questions, removes errors in skip logic, ensures that all values are within allowable ranges, and expedites administration and data processing.

- 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.**

MEF Associates conducted a literature review and did not find any existing studies of opt-out savings account programs at PHAs or among any sample of very low-income households. As far as we know, this study does not duplicate any existing study.

The research team considered the potential to use secondary (i.e., already existing) data sources for this study, including HUD and MTW agency administrative data, prior to writing the Opt-Out Savings Account Household Survey. The survey captures information on the key outcomes of interest for the study that cannot be measured with administrative data.

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

No small entities will be impacted. The Opt-Out Savings Account Household Survey will be administered to heads of household in HUD-assisted housing. These respondents are not small businesses. The project team will minimize the burden for all respondents by providing clear guidance on procedures and by requesting only the information required to achieve the study's objective that cannot be collected from administrative data sources. Respondents will be taken through an informed consent process that explains the study and informs them that their participation is voluntary and they are free to decline to participate or to end the interview at any point.

**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.**

Negative outcomes from not doing the Opt-Out Savings Account Household survey include the following:

- (1) Failure to respond to Congressional mandate to rigorously evaluate the MTW expansion policies (see Public Law 114-113, Section 239)
- (2) Inability to answer the critical policy research question (as determined by the Congressionally mandated Research Advisory Committee) of whether PHAs can implement an opt-out savings account program and whether such a program can improve the financial well-being of HUD-assisted households.

**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 1320.6 (Controlling Paperwork Burden on the Public – General Information Collection Guidelines). 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. Respondents are surveyed once and may decline to participate.
- **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.
- **Requiring respondents to submit more than an original and two copies of any document:** Respondents are not required to submit 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 than can be generalized to the universe of study:** This data collection does not include any statistical data that is not designed to produce valid and reliable results that can be generalized to the 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 classifications 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.

**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.**

**Consultation with Experts:**

The Moving to Work, Asset Building Cohort Evaluation was developed by HUD's contractors Abt Associates, Inc. (now Abt Global, LLC) and MEF Associates. Key members of the MEF and Abt research team included Co-Principal Investigators Sam Elkin and Dr. Larry Buron; Project Manager Dr. Stephen Nuñez; and Economists Dr. Judy Geyer and Dr. Shawn Moulton. MEF and Abt have also engaged Dr. J. Michael Collins of the University of Wisconsin Madison and Michael Lim of TransUnion as consultants on research design and convened an expert panel to review all materials produced as part of the research design report and data collection and analysis plan.

**Consultation with Stakeholders:**

As part of developing the research design for evaluation of the MTW asset building programs, the research team participated in multiple community of practice meetings with the PHAs in the Asset Building Cohort. The research team members were available to answer questions and to listen to input from PHA staff. PHA staff stated that they have the capacity to participate in the evaluation of their asset building programs.

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 June 2, 2025, (Docket No. FR-7103-N-01, pages 23354-23355) related to the data collection activities for the Moving to Work, Asset Building Cohort Evaluation. The notice provides a 60-day period for public comments, and comments are due August 1, 2025. No public comments were received.

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

Respondents to the Opt-Out Savings Account Household Survey will receive an electronic gift card. We will offer alternative formats if participants do not have an email address. To balance response rates across the treatment and control group, we will offer a slightly higher incentive to control group members (who may be more difficult to engage). This is a way to minimize non-response bias in the control group. We budgeted for an incentive payment of \$60 for control group respondents and \$40 for treatment group respondents.

We chose these amounts based on research on tokens of appreciation and the study team's experiences with other federal studies. Research has shown the effectiveness of a token of appreciation in increasing study participation of low-income households. Based on previous studies, we believe \$50-\$75 is a reasonable amount to incentivize participation in the interviews without being coercive.<sup>3</sup>

**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 contracted with an independent research team consisting of Abt Global (formerly Abt Associates) and MEF Associates, to conduct this research. HUD and the research team will maintain the privacy of respondents. These protections will be ensured by standard practices of privacy such as "need to know" access, electronic barriers to access, two-factor authentication, physical security of any paper documents containing personally identifiable information.

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 on how to protect private information and the study

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<sup>3</sup> Bridget, Kelly, Marjorie Margolis, Lauren McCormack, Patricia LeBaron, and Dhuly Chowdhury. (2017). What Affects People's Willingness to Participate in Qualitative Research? An Experimental Comparison of Five Incentives. *Field Methods*, 29:4, 333-350

will have a Data Security Plan governing the storage and use of the data collected through the study. Individuals will not be named in prepared reports.

As part of the IRB-approved informed consent process and in accord with HUD's status as a Common Rule signatory, respondents to the Opt-Out Savings Account Household Survey will be told that the information they provide will be used only for research purposes and that individuals will not be named or identifiable in reports.

A Privacy Impact Assessment was completed and a System of Records Notice (SORN) was published in the Federal Register (Docket No. FR-7092-N-09, pp. 4324-4325) on January 23, 2024.

**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 Opt-Out Savings Account Household Survey will ask questions about potentially sensitive topics including material hardship and experiences with financial institutions.

These items are necessary to understand participants' needs, barriers to building credit and savings, and experiences accessing services through the programs that are the focus of the study. To minimize the discomfort that such questions may pose, respondents will be alerted to the types of questions that might cause discomfort as part of the informed consent process. Staff will inform respondents that participation is voluntary and that they may refuse to answer individual items or choose to stop the interview at any time, including after the interview has started. Study participants will also be reminded that the study team will keep their responses private. When coordinating the interviews, the research team will identify at least one resource (potentially appropriate program staff) to refer participants to for support if they experience emotional strain.

The study requires collection of SSNs to facilitate matching to other administrative databases to measure the study outcomes. Without matching to these administrative data sources, the study would not be able to measure the key outcomes for households—including changes in credit scores and financial well-being—that are the focus of this study.

**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.**

Exhibit A-2 presents the estimated annualized (over 3 years) respondent burden for new instruments being added to this information collection. The burden estimates for the items originally approved under OMB# 2528-0345 can be found in the original ICR, approved in January 2024. This revision request includes the burden for the new Opt-Out Savings Account Household Survey and the advance notification letter that participants will receive.

#### **Exhibit A-2: Estimated Respondents, Burden Hours, and Costs**

<b>Information Collection</b>	<b>Number of Respondents</b>	<b>Frequency of Response</b>	<b>Total Responses</b>	<b>Total Burden Hour Per Response</b>	<b>Total Burden Hours</b>	<b>Hourly Cost Per Response</b>	<b>Total Cost</b>
Survey Advance Letter	1,100	1	1,100	.08	88	11.89	1,046
Survey	1,100	1	1,100	.5	550	11.89	6,539
<b>Total</b>							<b>7,585</b>

The average hourly rate for HUD-assisted households (\$11.89) is based on the minimum wages in the states in which the PHAs are located.

Explanation for Exhibit A-2: The number of respondents is determined by the sample size needed for the study. The frequency of response is “one” because this is a one-time survey. The per respondent number of hours for the Survey Advance Letter is estimated based on a rule of thumb that it takes about 45 seconds to read a paragraph of non-technical text or about 3 minutes to read one page of text. Based on the length of the advance letter and the technical level, the research team estimates less than 5 minutes per respondent per advance letter. The estimated response time for the Survey is based on information known about the items included in the survey. (The survey includes only pre-existing, already validated items.) The time to review the instructions for each section of the survey is added to the time to complete the items.



**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 to respond to questions during the interview described in item A.12 above.

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

Abt Global, LLC will collect the data under a HUD contract. HUD estimates the costs to the Federal government for collection and analysis of the data collected with the instruments submitted with this revision request to OMB #2528-0345 to be approximately \$165,009 per year for three years. The professional labor cost estimates for this information collection include project management staff, data analysts, survey methodologists, interviewers, and IT support staff. The labor cost estimates are based only on data collection and analysis tasks for Opt-Out Savings Account Household Survey, the subject of this revision request (see

Exhibit A-1). (Estimates for the data collection under the first phase of the study are reflected in the original PRA package, OMB #2528-0345, approved in January 2024.) Exhibit A-3 summarizes the cost per year. Estimated costs reflect the project budget based on the description of data collection and analysis tasks in the project scope of work and current GSA labor rates, Federal per diem allowances for travel, GSA translation\ interpretation contracted prices, and standard practice for compensating respondents for research interviews.

**Exhibit A-3: Estimated Costs Per Year**

Activity	Estimated Cost to Federal Government	Total Labor Hours for Information Collection
Professional labor	\$125,346	2,543
Travel	\$ 17,516	N/A
Translation and Transcription	\$3,257	N/A
Household token of appreciation or other direct costs	\$18,890	N/A
Total	\$165,009	N/A

Total estimated cost to the Federal Government in this table reflects costs only for the data collection instruments for which this revision requests OMB approval, so it is different from the previous submission which estimated only for the instruments approved in the original request.

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

This submission to OMB is a revision to a previously approved information collection request, OMB # 2528-0345, approved in January 2024. These changes reflect the fact that data collection efforts outlined for Phase 2 of the study are different from those approved in the first submission of this ICR.

**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 contracted research team will analyze and tabulate the data collected for the Moving to Work, Asset Building Cohort Evaluation. HUD will publish the final report. Standard statistical techniques will be used to analyze the data. Exhibit A-4 presents an overview of

the data collection and reporting schedule for the Opt-Out Savings Account Household Survey.

**Exhibit A-4: Data Collection Timeline**

Month, Day, Year	Activity
October 2023 to Dec. 2024	Conducting random assignment for the Opt-Out Savings program
Winter 2026	Follow-up Survey for Households in the Opt-out Savings evaluation
Spring 2026	Follow--up PHA Interviews with PHA staff, partner organization staff, and PHA residents; second round of Rent Reporting Qualitative Interviews
Fall 2027	Final report published

**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.**

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

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

No exceptions are necessary for this information collection.

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**B. Collections of Information Employing Statistical Methods**