

# MTO Research Solicitation

## May 21, 2004

### OVERVIEW

The U.S. Department of Housing and Urban Development (HUD) is pleased to make available to the social science research community data from the Moving to Opportunity for Fair Housing (MTO) Demonstration Program. MTO is an experiment to measure the impact of neighborhood on the lives and well-being of poor families. It offers an exceptionally rich dataset for understanding the role environment plays in individual outcomes. Despite the considerable work already done with these data, much remains to be explored. In making them available, HUD's goal is to encourage research that moves beyond the analysis already done.

There is no funding being offered with this research solicitation. The data are restricted to protect the privacy of the families and individuals who participated in the program, and successful applicants will be required to adhere to strict data protection requirements.

## 1.0 Introduction and Rationale

### Description of MTO

Moving to Opportunity (MTO) was designed to answer questions about what happens when very poor families have the chance to move out of subsidized housing in the poorest neighborhoods of five very large American cities. MTO was a demonstration program: its unique approach combined tenant-based housing vouchers (from the Section 8 program<sup>1</sup>) with location restrictions and housing counseling. MTO was also a randomized social experiment, carefully designed and rigorously implemented to test the effects of this approach on participating families.

Between 1994 and 1998, the housing authorities in five demonstration sites—Baltimore, Boston, Chicago, Los Angeles, and New York—worked in partnership with local nonprofit counseling organizations to recruit about 4,600 very low-income families for MTO. The families, all of whom lived in public housing or private assisted housing projects in the poorest parts of these cities, responded to outreach that offered them a chance to move with housing vouchers from their current homes and neighborhoods. Exhibit 1.1 summarizes key facts about demonstration implementation.

The demonstration sites shared some characteristics, including the presence of large, distressed public housing developments in concentrated poverty neighborhoods (where more than 40 percent of the population lived below the poverty line). The cities differed in other ways: in the racial and ethnic composition of their eligible populations and in the nature of their housing markets. Despite these differences, the demonstration was implemented with considerable uniformity, particularly with respect to recruitment, informed consent of participants, issuance of

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<sup>1</sup> In 1999 the Section 8 program was renamed the Housing Choice Voucher Program. In this report we will continue to refer to the program as *Section 8*, because the rules of the demonstration were set under that program.

vouchers, and the rules governing their use. Through joint training, central oversight, and regular monitoring and data collection, HUD made sure that the procedures developed for MTO were carefully followed.

A key reason for developing special procedures and making sure they were uniformly implemented was that MTO was a randomized social experiment as well as a demonstration program. The critical feature of MTO's research design was random assignment of the families who joined the demonstration (with their informed consent). Each family was randomly assigned to one of three groups:

- The **experimental group** was offered housing vouchers that could only be used in low-poverty neighborhoods (where less than 10 percent of the population was poor). Local counseling agencies helped the experimental group members to find and lease units in qualifying neighborhoods.
- The **Section 8 group** was offered vouchers according to the regular rules and services of the Section 8 program at that time, with no geographical restriction and no special assistance.

### **Exhibit 1.1 Moving to Opportunity Implementation—Basic Facts**

- **Origin**—The MTO demonstration was funded by Congress, with \$70 million in Section 8 rental assistance for fiscal year 1992 (carried over to fiscal year 1993), with additional vouchers allocated by participating housing authorities and with additional funds from the local housing authorities and nonprofit counseling agencies.
- **Sites**—Baltimore, Boston, Chicago, Los Angeles, and New York City.
- **Family eligibility**—Families had to live in public housing or private assisted housing in areas of the central cities with very high poverty rates (40 percent or more), have very low incomes, and have children under 18 years old.
- **Program size**—Among those who applied for the program between June 1994 and July 1998, 4,608 families were found to be eligible. Of those, 3,169 families were offered vouchers and 1,676 were able to find a unit and move successfully.
- **Continuous tracking**—HUD has been working to keep in touch with the MTO families since they joined. In 2002 researchers contacted almost 8,900 adults and children for this study. Taking into account a subsample of hard-to-find families, the effective response rate for the interim evaluation is 89 percent.

- Finally, **control group** members were not offered vouchers but continued to live in public housing or receive other project-based housing assistance.

To use their vouchers, families assigned to the experimental group had to move to low-poverty areas. Those in the Section 8 group could use their vouchers to move to neighborhoods of their own choosing. Both groups were required to make these moves within a limited amount of time.

In order to retain their vouchers, experimental families were required to stay in low-poverty areas for one year, after which they could move without locational constraints.

Exhibit 1.2 summarizes the key features of MTO's research design. Random assignment makes the three groups of participating families statistically the same, so that any later significant differences (differences greater than chance would produce) in the neighborhoods, housing, employment, or other aspects of the experimental group's lives in comparison with the control group can be attributed to the MTO intervention. Of course, such differences should only be attributed to MTO if there are social scientific hypotheses suggesting that changing location can influence these outcomes. And in fact, a considerable theoretical foundation does exist for the MTO experiment (as described below).

MTO eligibility was targeted to residents of project-based subsidized housing in neighborhoods with poverty rates of 40 percent or more. The mean poverty rate of baseline locations was, in fact, much higher at 56 percent. And a substantial proportion of MTO families were living in severely distressed public housing when they joined, including a number of the earliest developments to be demolished under the HOPE VI program.

After random assignment, members of the experimental group received their geographically restricted vouchers and worked with the local nonprofit counseling agencies to prepare for and conduct their housing searches in low-poverty areas. Just under half of the experimental group families moved to low-poverty areas with MTO vouchers. Families in the Section 8 group received their regular vouchers and housing authority briefings and assistance and then searched for housing on their own. Just over 60 percent of this group was able to use the MTO vouchers, which required moving to other housing but without the restriction to low-poverty areas.

After random assignment, members of the control group continued to live in their project-based subsidized housing in these areas of great poverty. The nonmovers in both the experimental and Section 8 groups also initially remained in their baseline public or assisted housing units. However, many of them moved later, and some were even able to obtain Section 8 assistance for relocation.

Despite its unique aspects, the MTO experiment can tell us a great deal about HUD's main current housing programs. While not representative of public housing nationwide, the conditions of distress and concentrated poverty where the families were living when they joined MTO were not uncommon in big city public housing across the country. By offering tenant-based subsidies (vouchers) to such families, MTO provides a test of what difference it might make to switch very low-income families from place-based to mobile subsidies. At the present time, these are the major forms of low-income rental assistance with about 1.2 million families and individuals living in public housing, 1.5 million households in privately owned assisted projects, and over 1.5 million households using vouchers. By constraining the experimental group to move to low-poverty communities, MTO was testing whether vouchers can be a vehicle for substantial changes in neighborhood environment. If the long-term results of MTO research show significant improvements in the well-being and life chances of experimental group members, we will have learned that housing vouchers can provide access to meaningful opportunities for poor families.

## Exhibit 1.2 MTO Experimental Design—Basic Facts

- **Research objective**—to test the long-term effects on adult and child well-being when families move from public or project-based assisted housing in very poor areas to private-market rental housing in areas with much lower poverty rates.
- **Experimental design**—random assignment of the families who joined the program to one of three groups:
  - An **experimental group**, which received Section 8 vouchers useable only in low-poverty areas (census tracts with less than 10 percent of the population below the poverty line in 1990), along with counseling and assistance in finding a private rental unit. Some 1,820 families were assigned to the experimental group, of whom 860 leased up.
  - A **Section 8 group**, which received regular vouchers (geographically unrestricted) and whatever briefing and assistance the local Section 8 program regularly provided. Of the 1,349 families assigned to the Section 8 group, 816 leased up.
  - A **control group**, which received no vouchers but continued receiving project-based assistance. Some 1,439 families were assigned to the control group.
- **Longitudinal study**—By following the families over a period of about 10 years, collecting data on various aspects of the adults' and children's lives, and comparing the experiences of each treatment group to that of the control group, the experiment would permit answers to these vital questions:
  - What are the impacts of joining the MTO demonstration on household location and on the housing and neighborhood conditions of the participants?
  - What are the impacts of moving to a low-poverty neighborhood on the employment, income, education, health, and social well-being of family members?

### HUD's intent in soliciting outside research on MTO

There has been quite a bit written about the MTO demonstration in the mainstream media, in academic journals, and in HUD reports. A number of useful HUD reports are available from the HUD User website.<sup>2</sup> In 1997, HUD commissioned a series of early single-site studies that stimulated interest in the demonstration and showed the broad utility of the research design and

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<sup>2</sup> Materials available at [www.huduser.org](http://www.huduser.org) include HUD (1996); Goering et al. (1999); Feins, Holin, and Phipps (1999); and Popkin, Harris, and Cunningham (2002).

data. These studies are summarized in Goering, Feins, and Richardson (2002), also available on the Internet.<sup>3</sup>

In 2003, HUD published the results of the MTO interim evaluation, which measured the effects of MTO participation four to seven years after program entry. The interim evaluation analysis (reported in Orr et al., 2003)<sup>4</sup> showed substantial, positive impacts on the mobility, neighborhood conditions, and housing for the experimental and Section 8 groups, notable positive effects on adult health, girls' mental health, reduced risky behavior and arrests for violent crimes among girls, and some improvements in school quality for children and youth in both groups. This analysis drew on extensive data in six study domains:

1. Mobility, housing, and neighborhood;
2. Adult and child physical and mental health;
3. Child educational achievement;
4. Youth delinquency and risky behavior;
5. Adult and youth employment and earnings; and
6. Household income and public assistance receipt.

The interim evaluation data were collected in 2002 and linked for each sample member with data from baseline (at program entry before random assignment) and from sample tracking between 1995 and 2001.

HUD wishes to give other researchers the opportunity to use the rich dataset assembled for the MTO interim evaluation. The early, exploratory research on MTO (referenced above) proved extremely fruitful for understanding the potential scope of changes in the participants' lives. And because of the breadth and depth of the interim evaluation data collection, there are many aspects of the data that have not been fully examined. The MTO data can be used to shed light on research questions in a wide variety of social scientific disciplines. And a large number of non-HUD funded researchers have expressed interest in analyzing the data using their own time and resources.

## **Nature of this Research Solicitation**

The ideal situation from the standpoint of encouraging additional MTO research would be to make a public use data set available. However, because of the small number of MTO sites, the unique characteristics of the MTO participants, and the necessity for researchers to have some information on participants' neighborhoods, this cannot be done. It is impossible to mask the data completely in order to protect the privacy of the sample members and the confidentiality of the responses they have provided until now. Therefore, HUD has decided to establish a system of Restricted Access Datasets, which will give others access to the MTO data under a licensing agreement (described more fully in the remainder of this document). Licensing the data in this

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<sup>3</sup> The article is at [http://www.fanniemaefoundation.org/programs/jhr/v13i1\\_fsgoering.shtml](http://www.fanniemaefoundation.org/programs/jhr/v13i1_fsgoering.shtml).

<sup>4</sup> This volume can be found at <http://www.huduser.org/publications/fairhsg/mtoFinal.html>.

way offers more research opportunity than the type of research data center system utilized by the Census Bureau and some other federal agencies, although not as much opportunity as would a public use data set. The system is thus a compromise—and something of an experiment for HUD—with the purpose of encouraging further exploration of the MTO interim evaluation data.

## 2.0 Description of MTO Data Availability and Access

### Privacy and Confidentiality Protections for MTO Data

The MTO data are protected by the Privacy Act of 1974 (under which all the data were collected) and by a Certificate of Confidentiality from the National Institutes of Mental Health. The Certificate of Confidentiality carries with it a significant obligation for those responsible for maintaining the MTO interim evaluation data. The Certificate affords permanent protection, in perpetuity, of the personally identifiable information maintained about participants in the MTO demonstration.<sup>5</sup> By extension, it also protects the participants against research (using the data) that could lead to such personal identification. Thus, it is critical that HUD put in place standards and monitoring procedures for outside researchers that will maintain this pledge.

### Two-Tier Licensing System

In the MTO interim evaluation dataset, there are certain components that carry significant risks of sample member identification and/or disclosure:

- Geographic information for current (2002) and past residential locations;
- Household composition data (relationships, ages, and genders of members); and
- School information for current (2002) and past schools of sample children.

Yet the very presence of linked geographical, household, and educational data is one of the most valuable aspects of the MTO research platform.

Studies proposed for the MTO data may or may not require access to the components that carry the greatest risk. HUD is establishing a two-tier licensing system for the MTO data, depending on the data needs of the research. The tiers will differ in several ways:

- In the content of the Restricted Access Data Set as to educational and geographic detail;
- In the researcher eligibility requirements and the number of researchers to be given data access; and
- In the level of data protection required of the authorized researchers and the amount of monitoring their projects will undergo.

**Tier 1** offers access to richer and more sensitive data (more geographic and educational detail), but the eligibility and data protection requirements will be stricter, and only ten (10) research proposals will be approved.

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<sup>5</sup> <http://grants.nih.gov/grants/policy/coc/background.htm>.

**Tier 2** offers somewhat more limited data access, excluding the components that carry the greatest disclosure risk. But the eligibility and data protection requirements for Tier 2 will be less strict and the authorized users will be subject to somewhat less monitoring. Up to 50 proposals will be approved, with more than one round of due dates and proposal review.

## Dataset Description and Access

### Sample definition and description

The sample used in the interim evaluation included all 4,248 families randomly assigned in the MTO demonstration through December 31, 1997.<sup>6</sup> This was not the entire MTO population: family intake continued in one site (Los Angeles) through July 1998, and lease-ups occurred there until March 1999. However, the sample for the study was restricted in order to assure that at least 4 years had passed since random assignment for all its members. The allocation of this sample among the treatment groups, by site and overall, is shown in Exhibit 2.1. The number of families in each site range from 636 families in Baltimore to 1,081 in New York City.<sup>7</sup>

**EXHIBIT 2.1**  
**ALLOCATION OF THE INTERIM EVALUATION SAMPLE FAMILIES BY SITE AND TREATMENT GROUP**

	Experimental Group	Section 8 Group	Control Group	Total
<b>Baltimore</b>	252	187	197	636
<b>Boston</b>	366	267	326	959
<b>Chicago</b>	460	202	232	894
<b>Los Angeles</b>	250	168	260	678
<b>New York City</b>	401	385	295	1,081
<b>All Sites</b>	1,729	1,209	1,310	4,248

Source: MTO data system

Sample: All families randomly assigned through December 31, 1997.

<sup>6</sup> The full MTO population consists of 4,608 families. The 4,248 families in the interim evaluation sample represent 92.2 percent of the full population. This study's sample includes all of the families in four of the five sites (Baltimore, Boston, Chicago, and New York).

<sup>7</sup> A somewhat larger number of families were assigned to the experimental group than to the Section 8 group to achieve the desired sample sizes despite a likely lower lease-up rate in the experimental group. Assignment rates within sites were further adjusted to compensate for differences between expected and actual lease-up rates. The sample weights contained in the MTO dataset adjust for differences among sites and over time in the rate of random assignment.

Although MTO enrollment took place by family, the interim evaluation focuses on individual members of these families and their experiences. It was designed to answer questions midway through the 10-year follow-up period about *one adult and up to two children* in each of the families in the sample. The children were sampled randomly from among all age-eligible children (ages 5 to 19) in each family.<sup>8</sup> Exhibit 2.2 shows the sample allocation by treatment group and site for the sampled adults and children. On average, the sample included 2.6 members per family, including 1.6 children.

**EXHIBIT 2.2**  
**ALLOCATION OF THE INTERIM EVALUATION SAMPLE MEMBERS**  
**BY SITE AND TREATMENT GROUP**

	Experimental Group	Section 8 Group	Control Group	Total
<b>Baltimore</b>				
Adults	252	187	197	636
Children	361	290	303	954
<b>Boston</b>				
Adults	366	267	326	919
Children	555	408	509	1,472
<b>Chicago</b>				
Adults	460	202	232	894
Children	764	331	373	1,469
<b>Los Angeles</b>				
Adults	250	168	260	678
Children	420	272	429	1,121
<b>New York City</b>				
Adults	401	385	295	1,081
Children	591	606	471	1,668
<b>All Sites</b>				
All	4,420	3,017	3,395	10,932
Adults	1,729	1,209	1,310	4,248
Children	2,691	1,907	2,085	6,683

Source: MTO data system

Sample: All families randomly assigned through December 31, 1997.

Exhibit 2.3 shows the allocation of the child sample by age among the treatment groups. A child's age for data collection purposes was uniformly measured as of May 31, 2001.<sup>9</sup> Different

<sup>8</sup> See Appendix A for details of sample selection.

<sup>9</sup> Since the field data collection continued through September 2002, this means that—at the moment they were interviewed or tested—some children were more than a year older than their age as defined for sampling.

**EXHIBIT 2.3**  
**ALLOCATION OF THE INTERIM EVALUATION CHILD SAMPLE BY AGE AND TREATMENT GROUP**

	Experimental Group	Section 8 Group	Control Group	Total
<b>Ages 5 to 7</b>	371	262	309	942
<b>Ages 8 to 11</b>	885	640	679	2,204
<b>Ages 12 to 19</b>	1,435	1,005	1,097	3,537
<b>All Children</b>	2,691	1,907	2,085	6,683

Source: MTO data system.

Sample: All families randomly assigned through December 31, 1997.

information was collected about different age groups. For the interim evaluation, the key age groups for the sampled children were ages 5 to 7, 8 to 11, and 12 to 19. These age groups were set to differentiate among children by developmental stage and by hypothesized differences in neighborhood influence.<sup>10</sup>

**Participant data collection for the interim evaluation**

Data about the MTO sample members in the interim evaluation sample were collected between January and September 2002 through interviews with the sample members and through direct measurement and educational testing. Exhibit 2.4 summarizes the topics about which data were collected, by method, according to the age of sample members.

Three surveys—household, youth, and child—were administered largely in person by trained interviewers, using Computer-Assisted Personal Interviewing (CAPI) on laptop computers. The surveys for all three samples were administered primarily in the respondents’ homes, with the session scheduled at the respondents’ convenience.<sup>11</sup> Field interviewers also recorded their observations of the home and neighborhood environments.

Data were collected from sample members in two phases: the full sample phase (in which all 10,932 sample cases were worked) and the subsample phase (in which additional efforts were made to complete data collection with a subsample of full phase nonrespondents). An intensive data collection effort involving more than 100 interviewers achieved high response rates for both adults and children. When the responses for the full sample are combined with the weighted responses for the subsample of hard-to-find households, the effective response rate for the interim evaluation was 90 percent for the adults and 89 percent for the children. Appendix A provides

<sup>10</sup> Although their ages were similar at the time of the interim evaluation, the children varied considerably in the length of their exposure to the MTO treatment. The baseline period for the sample began in September 1994 and ended in December 1997. Children 5 to 7 at the time of the study were from birth to age 4 at baseline. The 8 to 11-year-olds were ages 1 to 8 at baseline. And the youth (ages 12 to 19) ranged in age from 5 to 15 at baseline.

<sup>11</sup> A small number of surveys with adult and youth respondents were administered by telephone.

further details about the data sources, methods, sample sizes, and other features of the interim evaluation participant data collection.

**EXHIBIT 2.4**  
**CONTENT OF PARTICIPANT DATA COLLECTED FOR THE MTO INTERIM EVALUATION**

	<b>Adult<sup>1</sup></b>	<b>Youth 12-19</b>	<b>Children 5-11<sup>3</sup></b>
<b>Survey Contents</b>	Housing and neighborhood Education and training Employment and earnings Income and public assistance Outlook and social networks Health Household composition Child education <sup>2</sup> Child health <sup>2</sup> Child behavior <sup>2</sup> Child time use <sup>2</sup> MTO experience	Education Employment and earnings Risky behavior Health Neighborhood and social networks Emotions Time use Future plans	Education Neighborhood, danger, and risk Health Behavior and family dynamics
<b>Educational Testing</b>	None	Woodcock-Johnson Revised—selected tests	Woodcock-Johnson Revised—selected tests

Notes:

- <sup>1</sup> Adults were selected for interviewing in the following order of precedence: female head of family intending to move through MTO; female spouse of family intending to move through MTO; wife of baseline head, if a member of the family intending to move through MTO; non-female (male or unknown gender) head of family intending to move through MTO.
- <sup>2</sup> The adult respondent was asked questions about each sampled child in the household, up to two.
- <sup>3</sup> Surveys were administered only to sampled children ages 8 to 11. Direct measurement and educational testing were carried out for sampled children ages 5 to 11.

**Collection of administrative and published data for the interim evaluation**

The MTO Interim Evaluation drew upon several administrative databases for measuring both outcomes and mediating factors. A number of sources of published data were also used. Three categories of administrative and published data will be available in some degree as part of the Restricted Access Datasets:

1. Data from HUD administrative systems on sample member participation in the public housing and Section 8 programs;
2. Data on the schools attended by sample children (and their school districts) from state and local sources and the National Center for Educational Statistics Common Core of Data;
3. Published data from the U.S. Census of 1990 and 2000 at the census tract level.

## Summary of Tier 1 and Tier 2 Restricted Access Datasets

Exhibit 2.5 summarizes the Tier 1 and Tier 2 datasets being made available to researchers through this solicitation. Appendix B contains a description of the categories of variables included in each dataset.

**Exhibit 2.5  
Contents of the MTO Restricted Access Datasets**

Category	Tier 1	Tier 2
Sample coverage	Interim evaluation sample adults, youth, and children	Interim evaluation sample adults, youth, and children
Personal and household composition information	Gender, age, race, ethnicity, relationship to head, working status, educational attainment for all household members. RARE COMBINATIONS MASKED OR DROPPED.	Age categorized in 3-year intervals. All other information same as Tier 1.
Geographic detail	Census tract identifiers plus neighborhood characteristics for baseline, core move, and 2002 locations	Limited number of general neighborhood characteristics in intervals, no tract identifiers.
Variable values	No data restrictions on continuous measures	Primarily categorized data; continuous measures top-coded.

### 3.0 Principal Investigator and Research Team Requirements

HUD is setting a number of requirements with respect to the proposed MTO research, regarding both the Principal Investigator and the remainder of the research team. There are some differences in requirements, depending upon whether the proposed study falls in Tier 1 or Tier 2.

#### Requirements for the Principal Investigator

For all proposed studies using the MTO Restricted Access Datasets, the following requirements govern eligibility for the Principal Investigator (PI):

- The PI must have a direct employment relationship with a college, university, or research organization; or
- A faculty advisor must serve as the PI for a project proposed by a student, with the student signing a supplemental agreement.

In addition, for Tier 1 proposals, the PI must have a previous record of published research on a subject related to the proposed study.

Principal Investigators of approved studies will be required to sign a data security and confidentiality agreement and must also pledge:

- Never to attempt to identify any sample members;
- Never to link the MTO RAD to any other micro-data files;
- To adhere to transferability rules, and
- To cooperate with periodic monitoring and oversight.

In addition, for Tier 1 proposals, the PI must participate in an orientation session before accessing the MTO data.

### **Requirements for the Research Team**

For all proposed studies using the MTO Restricted Access Datasets, the following requirements will apply to any other individual who will work on the proposed study:

- All members of the research team must be named, with information on their employment status and institutional affiliation provided in the application.
- Student employment by research teams is permitted, provided that the student's academic advisor also signs the Supplemental Agreement. But no student may use the MTO RAD for dissertation, thesis, or course work of any kind.
- All research team members will be required to sign a supplementary agreement on data security and confidentiality.
- New members can be added to the research team, as long as the PI notifies the MTO data project and provides a signed Supplemental Agreement for the member.

In addition, for Tier 1 proposals, the entire research team must commit to participation in a researcher orientation before the MTO data can be accessed.

### **End of the Research Period**

The maximum length of Tier 2 projects will be 36 months. Tier 1 projects may be planned for up to 24 months, with possible extension to 36 months—if required—for items *already submitted* for publication.

### **Required Review of Research Results**

The PI is responsible for adherence to requirements for advance review of any dissemination of study findings. All articles, reports, statistical summaries, or other products of the research must be reviewed and approved by HUD before they are published *or otherwise communicated*. (HUD's interest is to ensure that the confidentiality and privacy protections are maintained; this is not a review of the content or quality of the research findings.)

A complete backup of the original RAD and any files derived from it, as well as the programs used in the analysis leading to the results, must accompany submission of a product to HUD for

review. This submission will serve as the durable, physical backup required by peer-reviewed journals as well as make the research compliant with the Federal Data Quality Act.<sup>12</sup>

### **Removal of MTO RAD and Associated Materials**

The PI is responsible for the mandatory return of all supplied data media, verified erasure of all electronic files, and destruction of all paper output and derived results on a pre-specified date. No electronic or physical evidence may remain. The PI must notify the MTO Data Project that this step is accomplished and certify to that fact.

### **Transferability Rules**

In circumstances where the PI changes his/her employment relationship during the period of the authorized MTO research, the RAD may be transferred to a different college, university, or research organization where the PI is now employed. However, HUD must be notified 60 days in advance of the change and must approve all changes of venue *before* they are made. The rules governing removal of the MTO RAD at the end of a research project (see above) shall also apply when the RAD is transferred. Further, the same qualifications and requirements will apply to the new research team and institution as applied to the original ones.

Should circumstances arise in which a change of PI is made by a research team, HUD must be notified 60 days in advance of the change, and all requirements set out earlier in this section must be met for the proposed new PI.

## **4.0 Institutional Requirements**

### **Eligible Institutions**

Colleges, universities, and research organizations in the United States are eligible to house approved studies using the MTO Restricted Access Datasets. The institution must be accustomed to research using confidential data, and it must have an Institutional Review Board (IRB), a specially constituted review body established or designated to protect the welfare of human subjects recruited to participate in biomedical or behavioral research.<sup>13</sup>

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<sup>12</sup> The OMB guidelines under this act (P.L. 106-554, December 2002) require that “influential” scientific, financial, or statistical information be “capable of being substantially reproduced.” The guidelines are found at [http://www.whitehouse.gov/omb/fedreg/final\\_information\\_quality\\_guidelines.html](http://www.whitehouse.gov/omb/fedreg/final_information_quality_guidelines.html).

<sup>13</sup> See [http://ohrp.osophs.dhhs.gov/irb/irb\\_chapter2.htm](http://ohrp.osophs.dhhs.gov/irb/irb_chapter2.htm) for the Federal Policy governing human subjects research, to which HUD subscribes.

## **Institutional Responsibilities**

Adherence to the requirements for use of the MTO RADs is the responsibility of both the PI and the host institution. Both are party to the data use agreement. In all cases, the institution housing the MTO research must meet these requirements:

- The institution must guarantee the protection and confidentiality of the MTO RAD, backing up the pledges of the PI and research team.
- The institution must provide a secure computing environment (as discussed further below).
- The institution's IRB must review and approve the proposed research, including the sensitive data security plan. This establishes a monitoring relationship within the institution, strengthening the MTO data protection.
- The institution must cooperate with periodic monitoring and oversight (including inspections);
- The institution must pledge to meet the RAD transfer requirements, if necessary; and
- The institution must verify the removal of the RAD and all associated materials at the end of the research period.

## **Computing Environment Requirements**

Institutions proposed to house the MTO RAD must provide a secure computing environment. In general, this means a physically secure PC(s) *not attached* to the institutional network or to the Internet, a local printer using easily identified paper not to leave the secure facility, and a local shredder for discarded paper. Back-up of processing programs is permitted, but back-up of data files is not. The specific means of meeting these requirements should be included in the research proposal to HUD. Researchers may propose an alternative computing set-up, but the stand-alone PC in a secure environment is the accepted method and the standard against which alternatives will be evaluated.

## **Transferability Rules for the Institution**

In circumstances where the PI changes his/her employment relationship during the period of the authorized MTO research, the RAD may be transferred to a different college, university, or research organization (as described in Section 3 above). Under those circumstances, the institution that initially housed the MTO RAD is responsible for verifying that all electronic and physical evidence of the MTO research has been removed from the institution's facilities and that no further work on the project is being conducted there.

## **Rules for Multi-institution Teams**

Under exceptional circumstances, involving research teams that have members from more than one institution, HUD may permit the RAD to reside in two locations. Both institutions must adhere to all the requirements above, submitting all information and certifications.

## 5.0 Proposal Requirements

The proposals for studies using the MTO Restricted Access Datasets must provide HUD with the information it needs to evaluate research value, disclosure risk, and adherence to the rules and requirements set forth in this solicitation. Proposal requirements differ between Tier 1 and Tier 2.

### Proposals for Tier 2 Studies

These are proposals for MTO research requiring only the data specified under Tier 2 in Exhibit 2.5 (also see Appendix B). Tier 2 proposals are limited to 20 pages (exclusive of resumes) and should address these specific topics:

- The research question to be examined;
- The need (justification) for access to the restricted MTO data to carry out the proposed research;
- The proposed analytic approach and how the MTO data will be used to carry it out;
- The duration of the proposed study (including start and end dates);
- The proposed product(s) of the study, including any publication plans for this work;
- The names and qualifications of the Principal Investigator and all other research team members;
- The institution where the research will be based, including its qualifications for the MTO RAD, its past experience in housing research using confidential data, and the specific unit and official with direct responsibility for the research project; and
- A detailed description of the computing environment to be used for the RAD and how it meets the MTO requirements.

A draft data security plan must accompany the proposal, along with information on the required time frame for the institution's IRB to review the study proposal and data security plan.

### Proposals for Tier 1 Studies

Because Tier 1 studies (by definition) require access to MTO data that carry more risk of sample member identification and data disclosure, the proposal requirements are greater. But to reduce the burden on both applicants and reviewers, HUD is requesting *initial short applications* from researchers with Tier 1 studies. Applicants that pass an initial review will then be invited to submit full proposals.

#### Short Application Requirements

Initial short applications for Tier 1 studies using the MTO RAD are limited to 15 pages in length and should address these specific topics:

- The research question to be examined;

- The need (justification) for access to the restricted MTO data to carry out the proposed research, particularly the need for Tier 1 data;
- The proposed analytic approach and the MTO data required;
- The names of the Principal Investigator and all other research team members, and a brief description of their qualifications;
- The proposed host institution and the specific unit and institutional official with oversight responsibility for the research project; and
- A brief description of the computing environment to be used for the RAD and how it meets the MTO requirements.

HUD will review the short applications and request full proposals from 10 to 15 applicants. HUD may also pose specific questions to applicants based on the contents of the short application.

### **Full Proposal Requirements**

The full proposals for Tier 1 studies should provide all the additional information HUD needs to assess the data security risks of the proposed study as well as to evaluate the qualifications of the PI, research team, and institution. Thus, Tier 1 full proposals may be up to 40 pages in length (exclusive of resumes and attached documents) and should address these specific topics:

- Any expansions or revisions regarding the research question to be examined, the need for access to the restricted MTO data, the proposed analytic approach, and the MTO data required;
- Answers to any questions posed by HUD on the research question to be examined, the need for access to the restricted MTO data, the proposed analytic approach, and the MTO data required;
- The duration of the proposed study (including start and end dates), within the 24-month maximum;
- The proposed product(s) of the study, including any publication plans for this work;
- Full information on the qualifications of the Principal Investigator and all other research team members;
- Full information on the proposed host institution, including its qualifications for the MTO RAD, its past experience in housing research using confidential data, and the operation of its IRB; and
- A detailed description of the computing environment to be used for the RAD and how it meets the MTO requirements.

In addition, the following items must be attached to the full proposal:

- 1) A draft IRB package and data security plan, along with information on the required time frame for the institution's IRB to review the package and security plan;
- 2) A letter verifying (for the PI and research team members) their employment or other relationship with the institution;
- 3) Signed confidentiality pledges for the PI and all team members;
- 4) The PI's signed pledges not to attempt to identify any sample members, to adhere to transferability rules, and to cooperate with periodic monitoring and oversight;

- 5) For the institution, a guarantee of data protection and confidentiality, signed by an authorized official, backing up PI and research team.
- 6) For the institution, a signed pledge of cooperation with periodic monitoring and oversight.

## Criteria for Proposal Evaluation

HUD will review the Tier 1 and Tier 2 proposals for MTO research with several goals in mind:

- To broaden the scope of questions being investigated using MTO data;
- To authorize research using relatively underutilized parts of the MTO dataset; and
- At the same time, to assure that the privacy of the MTO sample members and the confidentiality of their data continue to be fully protected.

The following general criteria will be applied to the evaluation of ***Tier 2 proposals***:

- 1) Quality of thought evidenced in the proposed research;
- 2) Understanding of MTO research already published;
- 3) Extent to which the MTO data uniquely address the research question(s);
- 4) Originality of proposed MTO data use;
- 5) Qualifications of the PI and research team;
- 6) Qualifications of the proposed host institution;
- 7) Adequacy of the draft data security plan.

HUD may require changes in the data security plan as a condition for approval of MTO RAD access.

In the ***Tier 1 short applications***, HUD will be looking for:

- 1) Quality of thought evidenced in the proposed research;
- 2) Understanding of MTO research already published;
- 3) Extent to which the MTO data uniquely address the research question(s);
- 4) Originality of proposed MTO data use and demonstrated need for access to Tier 1 data;
- 5) Evidence that the PI, research team, and proposed host institution meet the minimum requirements set forth in this solicitation; and
- 6) Initial evidence of capacity to secure the data.

HUD will rank the short applications on these criteria and also with reference to the goals of broadening the scope of questions being investigated using MTO data and authorizing research that uses relatively underutilized parts of the MTO dataset

The invited ***Tier 1 full proposals*** will be subject to extensive scrutiny. Initial review will verify the completeness of the submitted materials. Then HUD will assess:

- The quality of the research proposal (including the analytic approach);
- The extent to which the research proposal broadens the scope of questions being investigated using MTO data;
- The qualifications, research experience, and publications history of the PI and other team members; and

- The ability and willingness of the proposed host institution to provide a secure computing environment and to reinforce the data protections required of the PI and research team.

A detailed review of the data security plan and analysis of disclosure risks may result in rejection of the application or in HUD requiring changes in the data security plan as a condition for approval of MTO RAD access.

## 6.0 Process and Schedule for Researcher Selection

This section provides information on the process and schedule for selection of Tier 1 and Tier 2 research projects. The two tiers follow somewhat different processes and time lines. Both are shown in Exhibit 6.1. Note that the Tier 2 data will be made available first. We recommend that researchers interested in the Tier 1 data first request access to the Tier 2 data, so as to become familiar with the data in preparation for requesting use of the Tier 1 data.

**Exhibit 6.1  
Steps and Milestones for Researcher Selection**

Selection Process Step	Calendar Date
<b>TIER 1</b>	
Solicitation issued and advertised by HUD	June 7, 2004
Tier 1 short applications due	September 30, 2004
Invitations for Tier 1 full proposals issued by HUD	October 29, 2004
Tier 1 full proposals due	November 30, 2004
HUD pre-award questions/negotiations with researchers	December 1, 2004 through January 15, 2005
HUD final approval of 10 Tier 1 applications	February 1, 2005
Researcher orientation	February 15-March 1, 2005
<b>TIER 2</b>	
Solicitation issued and advertised by HUD	June 7, 2004
Tier 2 proposals due—first round	June 30, 2004
HUD approval of up to 25 Tier 2 proposals	July 29, 2004
Tier 2 proposals due—next round	Likely in Sept. 2004

## References

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