

MTW Collaborative

455 Massachusetts Avenue, NW, Suite 425
Washington DC 20001-2621



October 17, 2019

Regulations Division
Office of General Counsel
US Department of Housing and Urban Development
451 7th Street SW, Room 10276
Washington, DC 20410-7000

Re: [Docket No. FR-7015-N-08] 60-Day Notice of Proposed Information Collection: Family Report, MTW Family Report, MTW Expansion Family Report

To Whom It May Concern:

The MTW Collaborative, which represents both current and future MTW agencies, would like to thank HUD for the opportunity to comment on the proposed Form HUD-50058 MTW Expansion. While we commend HUD for taking some steps to streamline and improve the Form HUD-50058 for the incoming 100 MTW expansion agencies, we have significant ongoing concerns regarding the Form HUD-50058, particularly related to data reporting on local, non-traditional units, and persistent flaws in the PIC system. Below are our general comments, as well as comments on specific line items.

General Comments

Local Non-Traditional Units.

The MTW Collaborative is particularly concerned about the required data collection for local, non-traditional units. MTW agencies have previously objected to using the 50058 for local, non-traditional units. While we understand the desire of the MTW Office to easily validate data on households served, many MTW agencies have local, non-traditional units that are not conducive to the data collection and management necessary for 50058s. MTW agencies often partner with local service agencies and nonprofits to administer and implement their local, non-traditional housing programs. Requiring 50058 data collection for these units could cause a large administrative burden on partner agencies for what may have been a very small capital contribution to a larger project. If the PHA/partner must complete a 50058 form for each new household served, presumably that also includes when there are changes in household members, unit transfers, and move outs. Oftentimes, nonprofit partners are already reporting into other HUD systems, such as HUD HMIS, making data collection with the 50058 form unnecessarily duplicative. Additionally,

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the 50058 form is not practical for certain types of local non-traditional programs, like rapid re-housing, where a family may only be receiving assistance for a month or less.

PIC Errors

The Notice states that many of the PIC system errors dealing with allowances and rent calculation will either be relaxed from fatal errors to warnings or may be relaxed completely. We believe this is a step in the right direction, however several MTW agencies have reported that when errors occur entering Form HUD-50058 MTW data into PIC, the PIC system will not indicate the source of the error. While it is unclear if the same issue will arise for the Form HUD-50058 MTW Expansion, the MTW Collaborative would strongly encourage HUD to not only relax fatal errors but also update the PIC system so that the source of errors is indicated, as is the case for the standard Form HUD-50058. Doing so would reduce administrative burden on MTW PHA staff, who must spend extra time reviewing data for the source of the error.

Line-Item Comments

Line 1h, Unit Real Estate ID Number. HUD has proposed creating a unique identifier for each unit that will be assigned in PIC. It is unclear what HUD's expectation is for MTW PHAs to report 50058's for Project-Based Voucher (PBV) tenants. For example, would this apply to Tenant-Based Vouchers (TBV) that have been project-based? We would request further clarification on this change and its impact on MTW PHAs and their reporting.

Line 2a, Type of action. HUD has proposed removing the selection for Historical Adjustment, due to improvements in PIC. Many MTW agencies report the Historical Adjustment as necessary to successfully complete their data reporting because of the outdated PIC system. The MTW Collaborative commends HUD for making these needed updates in PIC, which will ease reporting for agencies and reduce staff burden.

Line 2w, End of participation reasons. HUD has proposed adding a line to capture exit data for families who leave a PHA's programs and provided a list of thirteen potential "end of participation" reasons that PHA staff can select from. We strongly believe that additional clarification is necessary as the list currently includes reasons that can overlap. For instance, if a resident is evicted for nonpayment of rent, PHA staff could potentially choose option #3 or #4 from the list. This may result in inconsistencies or underreporting of data metrics, because PHA staff are forced to choose one option or the other. We encourage HUD to 1) work with PHAs and

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PD&R to develop a list of clear and discrete options that promote consistency in data reporting and usefulness to both parties and 2) release additional guidance to PHA staff on how to best select among the available options. Additionally, we caution HUD to be realistic about what meaning can be made from the data collected. Many current MTW agencies already track these metrics internally, but the MTW Collaborative would urge that use of this metric on the 50058 form remains optional, as move out reasons are difficult to capture and even when self-reported are not validated.

Line 3g, Gender. HUD has proposed changing Line 3g from “sex” to “gender”, as well as adding an additional option of “Non-Binary/Other/Not Declared”. The MTW Collaborative supports these changes and encourages HUD to adopt these same changes across all 50058 forms.

Thank you for the opportunity to comment. If you have any questions, please do not hesitate to contact us.

Sincerely,

A handwritten signature in black ink, appearing to read "Andrew J. Lofton".

Andrew Lofton

President
MTW Collaborative