



November 3, 2020

Colette Pollard
Reports Management Officer, QDAM
U.S. Department of Housing and Urban Development
451 7th Street SW
Washington, D.C., 20410-7000

Re: OMB Control No. 2577-0216/Docket No. FR-7028-N-06: 60-Day
Notice of Proposed Information Collection: Moving to Work
Demonstration

Angela Hurlock
Chairperson

Craig Chico
Vice Chairman

Matthew Brewer
Dr. Mildred Harris
Meghan Harte
James Matanky
Debra Parker
Bill Thanoukos
Francine Washington
Board of Commissioners

Tracey Scott
Chief Executive Officer

James L. Bebley
Chief Operating Officer

To Whom it May Concern:

The Chicago Housing Authority (CHA) appreciates the opportunity to submit comments regarding HUD's proposed changes to the 50900 form. CHA has been an MTW agency for twenty years and has used its financial and regulatory flexibility to develop activities and programs that support the three statutory objectives of the MTW program while continuing to serve low-income residents of Chicago by providing access to safe and affordable housing. CHA recognizes HUD's interest in evaluating the success of MTW initiatives using data-driven measures that can be aggregated across agencies, but the current proposal would not achieve that goal.

Over the past few months, HUD has worked collaboratively with MTW agencies regarding the proposed changes to the 50900. While CHA appreciates HUD's willingness to do this, CHA supports the comments submitted by the MTW Collaborative and joins the MTW Collaborative and other MTW agencies in requesting that HUD honor its commitment to allow for additional time to engage in a collaborative process regarding updates to the 50900. HUD has proposed dramatic and substantial changes to the performance metrics, including aggregating activities by statutory objective. This is an interesting proposal and one that CHA doesn't necessarily oppose, but it requires much more discussion and analysis, and a consensus among agencies before proceeding.

CHA is further providing the comments below regarding specific proposed changes to the 50900.

Introductory Statement---Time Burden

CHA takes issue with HUD's estimate that preparing the MTW Annual Plan and Report take approximately 81 hours annually per PHA. It is unclear how this number was developed but it substantially underestimates the amount of time CHA and other agencies spend annually to prepare these documents. CHA and many other MTW agencies have staff people specifically assigned to work on these documents, plus numerous other agency staff who work on data collection and analysis to support the work of the MTW staff.

In addition, CHA engages in a robust and extensive public consultation process that requires considerable time and staff resources. We believe that a better understanding of the actual time spent by PHAs to prepare these documents could inform future discussions on changes to the 50900.

Section II: General operating information

A. Housing stock information

iii. Planned/Actual new project-based vouchers and iv. Existing project-based vouchers

CHA manages more than 170 Housing Assistance Payment (HAP) contracts covering more than 10,500 units, so including a list of all project-based vouchers, new and existing, in every MTW Plan and Report is time consuming and repetitive. In addition, separately and concurrently, HUD has proposed an additional PBV data collection system that would include, among other data, the information now required in this section of the MTW Plan and Report. Continuing to require this information in MTW Plans and Reports as well as HUD's proposed new data system is unnecessary and duplicative. CHA strongly urges HUD to reconsider the requirement that MTW PHAs list all project-based voucher units and explore ways to streamline the data collection to reduce rather than add to the administrative burden on PHAs.

Section III: Proposed MTW activities

E. Rent reform/term limit information ii. Hardship case criteria: HUD has proposed two additional requirements for new rent reform and/or term limit activities that are burdensome and/or unclear:

- **Reasonable accommodation policy:** HUD has updated the instructions to require a "hardship *and reasonable accommodation policy*" for any rent reform or term limit policy. PHAs are already required to establish hardship policies for rent reform and term limit activities. It is unclear what HUD intends by adding "reasonable accommodations," which are subject to separate regulatory requirements, to this section. For example, CHA has established a reasonable accommodations policy that is applicable agencywide. It is unnecessary and may create conflicts to establish multiple reasonable accommodations policies for certain MTW activities.
- **Hardship policies in appendix:** The proposed 50900 would require a copy of the hardship policy associated with any proposed new rent reform/term limit activity, to be included in an appendix for public review and comment. In addition to being described in the applicable MTW activities, hardship policies are included in PHA's Admissions and Continued Occupancy Policy (ACOP) and the Housing Choice Voucher Administrative Plan, both of which are already subject to public comment and consultation.

It is unclear why including this information in the appendix is necessary, particularly if the information will not be used in HUD's review of the activity.

Section IV: Approved MTW activities

General Comments

As noted at the beginning of this letter, CHA believes that additional time should be spent discussing with MTW agencies proposed changes to the performance metrics, including HUD's proposal to tie the performance measures to the three MTW statutory objectives. This proposal may provide a more useful and streamlined way to measure MTW activities across agencies, but there is not a consensus that this is the best approach. Discussions between HUD and MTW agencies have been productive so far and more extensive discussions are warranted.

CHA also has concerns about the inclusion of qualitative measures in the form of case studies as part of the performance measures for the MTW statutory objectives. For each statutory objective, the proposal requires two case studies with specific detailed information, which would require extensive participation by residents and an extensive use of MTW agency resources to identify residents willing and able to participate. Further, it may be difficult to identify residents impacted directly by the MTW activities whose primary objective is cost effectiveness, particularly if the activity has been in place for years.

The proposed requirement to include case studies in every Annual Report is inconsistent with the objective of collecting data that can be aggregated across agencies and is administratively burdensome for MTW agencies, who would be required to provide an excessive amount of information beyond that which is necessary for HUD to determine compliance with MTW statutory objectives. It would effectively place the burden of evaluating the MTW Demonstration with MTW agencies rather than with HUD. CHA recommends that HUD reconsider the inclusion of case studies as performance measures.

A1. Statutory Objective: Cost Effectiveness

- HUD is proposing to include operating information, such as program size and rate of unit turnover, and program compliance information, including quality assurance results. It is unclear how this information is correlated with any cost effectiveness activities or how it would be useful in evaluating such activities.

Section V: Planned application of MTW funds

CHA endorses the comments submitted by the Moving to Work Collaborative - Finance Workgroup on proposed changes to the 50900 form.

CHA appreciates the opportunity to collaborate with HUD and other MTW agencies on proposed changes to the 50900 form and welcomes the opportunity to continue discussions about the best framework for performance measures for MTW activities. We strongly urge HUD to continue its discussions with MTW agencies regarding performance measures so that we can reach a consensus that serves our common goals. If you have further questions regarding these comments, please contact Jennifer Hoyle at 312.913.7290.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Tracey Scott', with a stylized flourish at the end.

Tracey Scott
Chief Executive Officer
Chicago Housing Authority