

November 3, 2020

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Re: OMB Control No.: 2577-0216 / Docket No. 85-FR-55312: 60-Day Notice of Proposed Information Collection: Moving to Work Demonstration

To Whom it May Concern,

This letter is in response to Federal Register Docket FR-7028-N-06 60-Day Notice of Proposed Information Collection: Moving to Work Demonstration.

The San Antonio Housing Authority (SAHA) appreciates the opportunity to provide comments on the proposed changes to Form 50900 as associated with Attachment B of the Moving To Work (MTW) Agreement. Specifically, we are providing comments on the MTW performance metrics (Section IV) and tracking reserves (Section V.A.IV "Planned Application of PHA Unspent Operating Fund and HCV Funding").

We would first like endorse the comments submitted to HUD by the MTW Finance Workgroup regarding tracking reserves and reiterate their two concerns:

- **The reserve section should only focus on total unspent funds and planned uses of those funds.**

We recommend that the proposed reserve table include a single line – Total Beginning Balance of Unspent Funds and Total Planned Uses during the FY.

The table should not include a breakout across the three categories of HCV HAP, HCV Admin, and PH operating subsidy. As a key component to the Moving To Work agreement, current MTW agencies have flexibility with how to track their MTW funds including the allowed full fungibility/combining of MTW funds. These agencies would

not be able to provide the breakout back to origin sources.

Additionally, because this table will be part of the MTW plan, total reserves will be a forecasted figure as it is a forward looking calculation. Both the MTW Agencies and HUD agree, this figure is not meant to be a replacement for required information provided by the agency into HUD's Financial Data Schedule. The main purpose of the reserve schedule is to enable agencies to share information about future uses. Therefore, total funds available and how they will be used should be the primary focus of this section.

- **HUD needs to provide MTW agencies with accurate reconciliations of HUD held funds.**

In order to provide the total unspent MTW funds, MTW agencies will need to obtain, from HUD, the balance of MTW voucher funds being held by HUD. Currently, agencies receive this information, from HUD, on a sporadic basis and the information provided includes MTW voucher and non-MTW voucher funds combined (such as VASH and FUP). In order to properly provide a forecasted total MTW funds figure, we will need HUD to provide timely and accurate information on the MTW voucher funds being held by HUD for each agency.

Secondly, we would like to offer our comments on the Form 50900 performance metrics. Specifically, we offer the following points:

- **This version substantially changes the reporting framework without providing the necessary time for a rigorous review.**

Changes include requiring that MTW agencies report on performance metrics by statutory objective instead of on an individual activity level, which represents a significant shift in the reporting framework, as well as the introduction of new qualitative elements such as narratives and case-studies, and changes to the baseline reporting requirements.

Aggregating the metrics across all activities in one statutory objective will not only make it impossible to ascertain the impacts of any single activity on a PHA's performance or outcomes, it erroneously hinges on the assumption that PHAs develop MTW activities to address just one statutory objective.

In addition, some of the proposed metrics in aggregate will inevitably conflate agency performance with MTW activity performance -- including measures such as turnover and

program size should be included in Section II. Operating Information as opposed to Section IV. Approved Activities. Other new measures such as Employee: Unit ratio and number of staff positions offer no clear value for assessing performance of specific policy changes through MTW waivers.

While the shift in framework is intriguing, given some of the complexities presented, SAHA believes this new framework should be tested and vetted completely to ensure it will offer a significantly better reporting framework that is not contrary to the stated purpose of the 50900 -- to enable evaluation and identify best practices.

- **This version significantly increases administrative burdens with new reporting components.**

Qualitative Outcomes: In the proposed 50900 HUD added a new “Qualitative Outcomes” component to each statutory objective. While SAHA agrees the use of qualitative narratives could improve the ability to tell the story of MTW and how PHAs use the block grant and administrative flexibilities to adapt service delivery to the needs of their local communities and resident populations, the current proposal will be burdensome and time consuming without offering useful data. Below are initial recommendations:

- Offer the case studies as a voluntary supplement
- Allow PHAs to choose which statutory objectives to focus on and how many case studies to provide.

Program Compliance: In the proposed 50900 HUD added a new “Program Compliance” component within the Cost Effectiveness metrics sections. In addition to state audits and our own local high accountability standards, MTW PHAs already complete an annual audit pursuant to federal Office of Management and Budget Circular A-133 including an MTW-specific compliance supplement. Adding program management oversight to the MTW plan or report is wholly out of scope and must be removed from further conversations about the MTW metrics.

Thank you for the opportunity to submit comments. SAHA welcomes the opportunity to continue to collaboratively work with HUD to develop MTW performance metrics and a Form 50900 that more effectively captures and reports on MTW initiatives and impacts and would ask that HUD honor its commitment to do so. If you have any questions, please do not hesitate to contact us.



Sincerely,

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