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November 3, 2020

VIA EMAIL

Colette Pollard, Reports Management Officer
Dawn Smith, Office of Policy, Programs and Legislative Initiatives
Department of Housing and Urban Development
451 7th Street SW, Room 4176
Washington, DC 20410-0500

**RE: 60-Day Notice of Proposed Information Collection: Moving to Work
Demonstration; OMB Control No.: 2577-0216**

To Whom It May Concern:

The King County Housing Authority (KCHA) appreciates the opportunity to submit comments on HUD's proposed changes to Form 50900, which guides annual planning and reporting for agencies participating in the Moving to Work (MTW) demonstration. Like HUD, we are interested in changes to the reporting framework that will help HUD and MTW agencies "tell the story" of the MTW demonstration and of particular initiatives.

While we acknowledge that the currently proposed Form 50900 does not reflect all of the conversations that have occurred between HUD and the MTW agencies to date, we believe that the framework proposed in the current 60-Day Notice requires considerable refinement and further consultation. We endorse the comments submitted by the Moving to Work Collaborative and join their request asking HUD to rescind the proposed changes to the MTW Performance Metrics under Section VI. We believe that HUD should extend the current metrics framework until such time that HUD and MTW agencies agree on a reporting regime that is useful to both parties.

HUD Should Rescind the Proposed MTW Performance Metrics Framework and Continue Productive Consultations with MTW PHAs

We are very appreciative of HUD's consultation with the 39 MTW agencies on updating Form 50900 in a way that enables further planning, monitoring, and evaluation of the MTW program. The discussions between HUD and MTW agencies have been productive, but we believe HUD should allow additional time for these to play out.

The proposed changes to Form 50900 include an entirely new framework for selecting metrics to report on the progress of MTW initiatives. Given the myriad flexibilities that MTW has allowed, devising a consistent and informative reporting framework is complicated work that will take considerable time to get right. We fear that there is insufficient time before the form's expiration on January 31, 2021 to rework this framework in a mutually beneficial way. For this reason, we ask that HUD continue these discussions outside of the Paperwork Reduction Act (PRA) process and update the metrics at a later date.

Concerns Regarding the Proposed MTW Performance Metrics Framework

The existing Form 50900 requires MTW agencies to select metrics for individual activities and track changes against a baseline. The new form deviates from this reporting framework to require agencies to roll-up initiatives into one of the three statutory objectives. This may be a promising approach. Indeed, the cumulative impact of our MTW activities is precisely what enables KCHA, and other MTW agencies, the capacity to pursue additional innovations in how we provide housing.

The proposed reporting framework does include improvements. For instance, we appreciate the inclusion of the narrative alongside the aggregate metrics and the ability to select "N/A" for metrics that are not relevant to an agency's activities. At the same time, as currently presented, the framework poses concerns that we look forward to exploring further with HUD staff.

First, as currently designed, the aggregate approach may not yield useful results from which HUD could use to evaluate the effectiveness of individual MTW activities. Rolling up the outcomes may mask the meaningful impact of discrete activities. This is most evident under *A1. Statutory Objective: Cost Effectiveness*. For this objective, KCHA would report on a set of metrics that encompass our entire universe of federally-subsidized programs because our implementation of certain cost-effectiveness activities are program-wide (such as those related to streamlining processes Housing Choice Voucher and Public Housing processes and rent calculations). It is not clear how such MTW activities, which often save staff time, would be reflected in these program-wide metrics. While not perfect, the activity-level reporting in the current 50900 has allowed HUD to identify promising practices and incorporate these into standard PHA policies. This includes triennial certification for fixed income households, less frequent inspections, and flexibility on the extent a PHA can project-base vouchers. Any new system should ensure that HUD and fellow MTW agencies are able to identify promising practices.

Second, the revamped framework would not lower the amount of time that PHA staff will spend completing the report, despite HUD's goal to simplify the information collected. A summary still requires PHAs to fill out and calculate metrics for individual initiatives. For example, despite being required to submit only aggregate statistics, we would still need to work with each of our non-profit partners to obtain data points to report on our local and non-traditional programming. At the same time, the proposed Form 50900 introduces a new set of metrics which may prove difficult to set historical baselines for (such as initiatives established over a decade ago). We are not opposed

to conducting careful analysis of historical data, but we must be certain that it will yield useful information to understand the effectiveness of our activities.

Finally, the MTW Performance Metrics could provide a misleading picture of the impact of various MTW activities and the numerous factors that contribute to particular outcomes. The inclusion of measures such as Average Contract Rent and Average Subsidy Costs may be useful to understand the breadth of an agency's activities, but they are also heavily influenced by local market conditions (such as rents, employment, and wages) as well as agency strategy and other contextual factors (such as the mix of household sizes served over time, influenced in part by allocations of special purpose vouchers). HUD intends to allow discretion in how agencies assign statutory objectives to particular activities, but this discretion may lead to a lack of consistency in interpreting outcomes across PHAs.

Given these concerns, we ask that HUD delay implementing the newly proposed MTW Performance Metrics section. We look forward to the opportunity to further explore the introduction of a new aggregate reporting framework that allows for transparent monitoring and evaluation of MTW activities.

HUD Should Remove Duplicative and Onerous Reporting Requirements

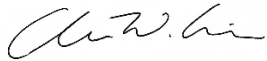
The proposed Form 50900 also introduces a number of duplicative and onerous requirements that should either be removed or clarified. These include:

- **Program Compliance:** Section A1 of the MTW Performance Metrics section introduces a new set of quality assurance metrics focused on error rates. We do not disagree that PHA staff should understand the policies for calculating rents and otherwise properly implementing MTW-approved policies. But like other PHAs, MTW agencies undergo state audits and maintain high accountability standards and internal oversight. In addition, MTW PHAs already complete an annual audit pursuant to federal Office of Management and Budget Circular A-133. The introduction of quality assurance metrics should be removed.
- **Qualitative Outcomes:** Form 50900 also proposes required qualitative “case studies” for each statutory objective. We value qualitative evaluations of our housing initiatives, but these requirements will be burdensome to seek out each year and are so limited in scope and sample that they will provide little insight to the full impact of particular activities. We recommend that HUD make such case studies voluntary.
- **Project-Based Voucher Reporting:** It is worth noting that HUD plans to introduce a separate reporting module for Project-Based Vouchers (see FR-7024-N-40: 30-Day Notice of Proposed Information Collection: Project Based Vouchers (PBV) Data Collection). Agencies should not be required to report on their project-based contracts multiple times throughout the year and in different reports. If HUD introduces the new online module –

which will be up to date – they should remove the project-level reporting requirements from the MTW report.

Thank you for the opportunity to provide comment on the proposed Form 50900. We look forward to the opportunity to continue work collaboratively with HUD staff to devise a reporting framework that allows for transparent reporting on the effectiveness of MTW activities.

Sincerely,

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

Andrew Calkins

Manager of Policy & Legislative Affairs