



Akron Metropolitan Housing Authority
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April 6, 2023

**Akron Metropolitan Housing Authority's Response to Proposed Information Collection:
Family Report, MTW Family Report, MTW Expansion Family Report
OMB Control No. 2577-0083**

The Akron Metropolitan Housing Authority (AMHA) is in agreement with most of the proposed changes regarding the revision of Forms HUD-50058, HUD-50058 MTW, and HUD-50058 MTW Expansion Family Reports. We do have some concerns regarding a few changes being proposed. We have outlined below the points we agree with as well as the concerns and questions.

Section 2: Action

AMHA has no foreseeable concerns with HUD's proposal to update the 50058 codes for special programs and types of actions.

Section 3: Household

HUD is considering changing the Alien Registration number to provide alternatively for a USCIS Number or USCIS case number field. AMHA has no foreseeable concerns with this proposal.

HUD is considering updating the field for Sex to Gender and allow for inclusion of XNon-Binary/Transgender, NR-No Response/Prefer not to answer, and the option to pick more than one response. AMHA's only foreseeable concern is regarding the Family Self-Sufficiency Program (FSS) for Housing Choice Voucher (HCV) clients that choose to stay under the old FSS Contract. To evaluate their rent recertifications to determine if they are automatic graduates, we do this by looking at the family members' ages and genders to determine the number of bedrooms they qualify for. If gender is listed as "XNon-Binary/Transgender, NR-No Response/Prefer not to answer," or multiple selections, how can we determine the number of bedrooms? How will we determine automatic graduates? What are other Housing Authorities using to determine bedroom size to determine Automatic Graduates?

HUD is considering requesting information about a household member's Sexual Orientation. It is AMHA's belief that it is unethical and intrusive to ask this question, and irrelevant for housing purposes or for any of our supportive programs for residents. The collection of this information is not necessary for the proper performance of the functions of the agency, and has no practical utility. We strongly oppose this change being implemented.

Section 8: Expected Income per Year

HUD proposes to revise this section heading, and include additional questions consistent with HOTMA rulemaking. Although HUD did not request comments for this section, AMHA believes it would be helpful to know if a family is over-income, and when the date the 24-month grace period begins. Having this information would allow us to support families in adjusting to no longer having the “safety net” of income-based housing.

Section 17: Family Self-Sufficiency (FSS)/Welfare to Work (WtW) Voucher Addendum

HUD proposes to revise Section 17 heading to read “Supportive Services Programs.” The section removes the Welfare to Work voucher questions, but provides information on effective date, employment, and services for other supportive services programs, such as ROSS and Jobs Plus. AMHA supports this change, as it will give a more accurate and comprehensive snapshot of the services a family receives and the different programs they may be involved with. It would also be helpful to list exit reasons not just for FSS, but for other Supportive Services Programs as well.

Thank you for the opportunity to comment.

Sincerely,



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