



April 10, 2023

Via Federal eRulemaking Portal

Reports Management
U.S. Department of Housing and Urban Development
451 7th Street SW, Room 4176
Washington, DC 20410-5000

Dear Sir/Madam:

**60-Day Notice of Proposed Information Collection: Family Report, Moving to Work (MTW) Family Report, and MTW Expansion Family Report
(Docket No. FR-7076-N-05)**

This letter serves to comment on the U.S. Department of Housing and Urban Development's (HUD) 60-Day Notice of Proposed Information Collection: Family Report, MTW Family Report, and MTW Expansion Family Report (Docket No. FR-7076-N-05).

The Los Angeles County Development Authority (LACDA) thanks HUD for making relevant and necessary changes to the Family Report (Form 50058). Through these proposed revisions of data collection, HUD is providing Public Housing Agencies (PHAs) an avenue to comment on the changes before being made final and address questions posed by HUD regarding the administration of this proposed rule.

I. Below are the LACDA's comments on the solicited questions posed by HUD in Docket No. FR-7076-N-05.

Item 1. HUD requests comments on whether the codes proposed, and currently used in these sections, represent the best code options for PHAs when completing the Form 50058; and, whether new or changes to existing codes should be considered.

The LACDA is in favor of adding codes to documents when a tenant will have a Project-Based Voucher (PBV) transfer to a Tenant-Based Voucher. The code will help the LACDA to track the tenant's continued assistance through the PIH Information Center (PIC), in addition to the PHA's internal system of collection data.



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The LACDA is also supportive of HUD adding an action code for non-income Interim Re-examinations to record household composition changes since this will also assist the LACDA with tracking family movement through the use of the voucher. Such tracking could assist the LACDA with revisiting its policy for the issuance of bedroom sizes and family additions.

Item 2. In addition, HUD is considering updating the field for Sex to *Gender* and allow for inclusion of X-Non-Binary/Transgender, NR-No Response/Prefer not to answer, and the option to pick more than one response. HUD recognizes that some PHAs have policies that use this field response to determine bedroom sizes, and other PHAs have State requirements to allow other such gender designations. Therefore, HUD requests specific comment on what barriers PHAs might face if HUD makes these changes, and what guidance would be helpful for PHAs if HUD does implement this change. Lastly, HUD is proposing to change the Race question to include a new code “Other” and considering adding to the Disability question a new code “No Response.”

The LACDA respectfully requests that HUD keep the field for “Sex” and add a separate field for “Gender,” making both fields mandatory. Sex and Gender identities may not be conflated together and allowing participants to select a different option for each field would help PHA staff address program participants by the Gender they identify as, while also maintaining accurate records of their Sex. For example, if a program participant’s Sex is reported as female, but their Gender is reported as male, the PHA will be required to distinguish between both on the Form 50058 and practice Gender Inclusivity while addressing the program participant respectfully.

The LACDA requests further clarification on HUD’s proposed change to add the code “Other” in response to the Race question. If the code “Other” is added, will HUD allow or require program participants to provide a response that will permit the PHA to also capture that response on Form 50058? Or will capturing the information then be a requirement of the PHA? If program participants are given the option to report individualized responses, it may further complicate having uniform data collection for PHAs across the nation.

HUD should consider asking respondents (who select multiple Race options) which Race they primarily identify with to deviate from having an increased number of “Other” responses.

Item 3. HUD is also considering, in response to [Executive Order 14075](#), Advancing Equality for Lesbian, Gay, Bisexual, Transgender, Queer, and Intersex Individuals, requesting information about a household member's Sexual Orientation. HUD requests comments on whether this field should be added, if it's added should it be limited to specific household members (e.g., adult members or head of household), and whether the categories are accurate.

The LACDA respectfully requests that HUD not add a field requesting information on sexual orientation. Requesting a program participant's sexual orientation may be perceived as invasive since disclosing such information has no direct correlation to the client's eligibility for rental assistance under HUD requirements. The LACDA sees the collection of sexual orientation as having no value for data collection since it would not serve a purpose in furthering its goals and objectives.

II. HUD General Comments

1. Regarding the proposed addition of the code "No Response" to the Disability question:
 - a. The LACDA respectfully requests that the code "No Response" be added to provide program participants the ability to maintain privacy if they choose not to disclose a disability.
2. Regarding the proposed added lines to include a date when the family was selected from the waiting list; if the family was formerly homeless; if the family transitioned out of an institutional setting; and whether there was a special non-waiting list admission:
 - a. The LACDA respectfully requests that HUD add lines in the Form HUD-50058 to include dates for all categories mentioned. Additionally, the LACDA will benefit from an additional item requesting information on targeted funding programs such as the Veterans Affairs Supportive Housing Program (VASH), the Family Unification Program (FUP), and the Mainstream Voucher Program. Currently, the LACDA has internal staff manually track similar designations and expends administrative funds for specialized customizations. Having the fields provided through the Form 50058 will eliminate such costs.
3. Regarding the proposed addition of items requesting information on whether the family received mobility-related services; if a security deposit was paid by the PHA on behalf of the family; and if the family received a higher Payment Standard as a Reasonable Accommodation:
 - a. The LACDA respectfully requests that HUD move forward with adding fields to track mobility-related services, security deposit assistance, and Reasonable Accommodation to support higher Payment Standards in place. Similar to question 2 above, this addition will assist the LACDA with tracking and data collection. At this time, the LACDA tracks similarly collected information via a customized system that is maintained internally. This will eliminate costs for a PHA and will help with financial tracking since recent HUD awards of vouchers have permitted uses for these activities.

In closing, the LACDA would like to again thank HUD for providing PHAs with the opportunity to comment on the proposed changes to the Form HUD-50058. Should you have any questions regarding this letter, you may contact Aletheia Broom, Director, Housing Assistance Division, at (626) 586-1670, or by email at aletheia.broom@lacda.org.

Sincerely,

A handwritten signature in blue ink, appearing to read "Emilio Salas".

EMILIO SALAS
Executive Director

ES:sc