



Colette Pollard
Report Management Officer
QDAM

April 10, 2023

U.S. Department of Housing & Urban Development
451 7th St., SW
Washington, DC 20410

RE: 60-Day Notice of Proposed Information Collection: Family Report, MTW Family Report, MTW Expansion Family Report; OMB Control No. 2577-0083

Dear Colette Pollard,

Opportunity Home San Antonio appreciates the opportunity to comment on the proposed changes to the HUD 50058 form. Our organization provides critical housing services to over 61,000 individuals in our local community -- ensuring over 30,000 households are able to affordably rent their homes and remain in stable housing.

Opportunity Home agrees that the 50058 form is in need of updating for various reasons and generally supports HUD's effort. We look forward to continued engagement with HUD in order to ensure data collection and reporting requirements are appropriate and necessary to continuing to provide critical housing services to those we serve.

Below are our general comments, as well as comments specific to proposed changes by section.

General Comments

- Proposed changes to data collection should include more information on intended use of data including but not limited to whether they are in alignment and/or support specific HUD and/or federal goals and/or are necessary for program administration.
- Proposed changes to fields should include detailed definitions in order for appropriate review and comment by PHAs.

Section Specific Comments





Section 1

- Proposed updates and addition of real estate ID numbers are welcomed, but the organization would like more information on how these will be used.

Section 2

- Removing Historical Adjustment: Would like more information on how this change will mitigate the current system limitations that require our team members to perform historical adjustments for documenting errors in PIC.
- Adding Code for PBV Transfer to Tenant-Based Voucher: None.
- Adding two action types to record changes when family will not receive an interim income reexamination due to HOTMA: None.
- Changing “FSS Participation” to “Supportive Service Program Participation”: Would like specific definition for this new term
- Adding End of Participation List: This list could be helpful. Would like more guidance on how existing PHA-developed lists could fit into this. Would like more specific definitions and guidance on how PHAs should select from the list to ensure comparability and data integrity.
- Adding List of Interim Reexaminations: This list could be helpful. Would like more guidance on how existing PHA-developed lists could fit into this. Would like more specific definitions and guidance on how PHAs should select from the list to ensure comparability and data integrity.
- Adding Type of Voucher Issued: This list could be helpful. Would like more guidance on how existing PHA-developed lists could fit into this. Would like more specific definitions and guidance on how PHAs should select from the list to ensure comparability and data integrity.
- Adding Date HCV Unit is Vacated: This might be difficult to collect from landlords.

Section 3

- Including USCIS or USCIS Case Number Fields as Alternative to Alien Registration: None
- Update to Sex/Gender to include X-Non-Binary/Transgender and NR-No Response/Prefer Not to Answer: We support efforts to be more inclusive in data collection but have significant concerns about data security, privacy, and use of this data. We need more information on how this information would be used by HUD and safeguarded. We would also want more guidance from HUD on how PHAs can safeguard this data to ensure its proper use.
- Requesting information about a household member’s Sexual Orientation: Sexual orientation can change over a person’s lifetime. We support efforts to be more inclusive in data collection but have significant concerns about data security, privacy, and use of





this data. We need more information on how this information would be used by HUD and safeguarded. We would also want more guidance from HUD on how PHAs can safeguard this data to ensure its proper use.

- Updating Race Field – including “Other” as an option: OMB released a notice in Jan 2023 on initial proposals for Updating Race and Ethnicity Statistical Standards, is HUD considering aligning with the OMB efforts?
- Updating Disability Field – including “No Response” as an option: Agree with the change.

Section 4

- Adding date when family was selected from waiting list: More information is needed to ensure this would not trigger any PIC errors.
- Adding if the family was formerly homeless: There is currently a field “homeless at admission”. More information is needed.
- Adding new line if family transitioned out of an institutional setting: More information is needed from HUD on definition/examples of institutional setting.
- Adding if there was a special, non-waiting list admission: More information is needed from HUD on definition/examples of these types of admissions.

Section 5

- Add Urbanization code to accommodate Puerto Rican addresses: None.
- Providing for the type of accessible unit identified by the PHA: PHAs are already required to report whether the unit is accessible. More information is needed from HUD to clarify.
- Adding a field for whether the last inspection passed by the unit was an alternative inspection: More information is needed on how HUD intends to use this information.

Section 6 through 17

- No comments

In addition, we would like to endorse the comments submitted to HUD by the MTW Collaborative.

Thank you for the opportunity to comment.

Sincerely,

DocuSigned by:

 4/10/2023
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Richard Milk
 Planning Officer

