



April 7, 2023

Office of Policy, Programs and Legislative Initiatives
Public and Indian Housing
Department of Housing and Urban Development
451 7th Street SW, Room 10276
Washington, DC 20410-0500

Re: FR-7076-N-05 60-Day Notice of Proposed Information Collection: Family Report, MTW Family Report, MTW Expansion Family Report

To whom it may concern:

New York University's Furman Center for Real Estate and Urban Policy appreciates the opportunity to submit comments on HUD's Notice of Proposed Information Collection: Family Report, MTW Family Report, MTW Expansion Family Report.¹ The NYU Furman Center advances research and debate on housing, neighborhoods, and urban policy by providing academic and empirical research, promoting frank and productive discussions among stakeholders, and providing essential data and analysis to practitioners and policymakers.²

The Furman Center has conducted considerable research on HUD's affordable housing programs over many years, using the administrative data gathered via these forms. We currently have two relevant research projects on HUD programs. The first ("Advancing Equity and Efficiency in the Housing Choice Voucher Program: Understanding and Improving Lease-Up Rates and Search Times") is developing and validating a methodology for estimating timely lease-up rates for new voucher recipients, relying solely on HUD administrative data. This will enable HUD, housing authorities and researchers to assess the performance of the Housing Choice Voucher program and test the efficacy of various policy reforms. The second project ("Exploring the Feasibility of Linking Eviction Records to Administrative Databases for HUD's Housing Choice Voucher Program") will determine whether, and under what conditions, HUD's administrative data on voucher holders (drawn from the Family Reports) can be reliably linked to publicly available eviction records. Such linking would allow HUD (and others) to monitor and assess the prevalence and impacts of eviction filings on voucher holders.

Each of these projects relies on data drawn from the Family Reports. We are very familiar with what does – and does not – work well with the current 50058 forms in terms of collecting data most relevant for program monitoring and improvement. The Family Report, MTW Family Report, and MTW Expansion Family Report are core to program operations, and we applaud HUD's decision

¹ 1 88 Fed. Reg. 8301 (Feb. 8, 2023)

² These comments do not represent the institutional views (if any) of NYU, NYU's School of Law, or NYU's Wagner Graduate School of Public Service.

to consider some modifications as it also adapts to Housing Opportunity Through Modernization Act of 2016, Public Law 114–201, (HOTMA) rulemaking, as well as changes for consistency across forms. Below are some specific proposed changes for which we wish to highlight our support, as well as suggested additional changes that could make the data more useful for HUD and program operators.

Overarching change: HUD will be moving many of the codes from the form itself and placing them in the instruction booklet.

We strongly support this change, making the forms themselves less cumbersome and permitting HUD to more easily modify instruction to clarify specific data elements. In our own work, we have relied on the instruction booklet as the best up-to-date guidance on using the 50058 data.

Section 2 Action Codes

Proposed changes we particularly support:

- HUD’s proposal to add questions on the primary reason for a family’s end of participation (consistent with the MTW expansion 50058) to include tenant initiated code and a nonpayment of rent code,
- Adding information on the date a participant vacated a unit.

This later data point on precise timing of occupancy could assist HUD and housing agencies in identifying assisted households in local eviction records, particularly where record-matching is based on address.

Additional suggested change:

- Line 2a, action types. Action code 10 is for the issuance of a voucher, the accuracy of which is critical for calculating the success rate of new voucher recipients. In our work, we have found that some housing agencies only record issuances for new voucher recipients while others also record issuances for existing recipients intending to move, and these PHA practices are not always consistent over time. The limited variable fields available in issuance data (at least to researchers) cannot distinguish between these two types of issuances. Hence calculating success rates for new recipients requires linking issuance actions to longitudinal admission data in order to identify which are voucher issuances to new recipients.
- To enhance the clarity and utility of action code 10, we recommend creating two distinct issuance codes: 10_A Issuance to a new HCV recipient; and 10_ B Issuance to an existing HCV recipient. This would permit HUD to more easily use issuance data to calculate success rates.

Section 4 Background at Admission

Proposed changes we particularly support:

- New 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.

Additional suggested changes:

- A clarification that these proposed changes, and lines 4a-4f, should be recorded in all issuance actions (so prior to admission) not just new admissions, to enable assessment of how any of these factors might affect a household's ability to successfully lease.
- 4b. Replace prior ZIP Code with prior address. ZIP Codes are large and do not map perfectly to census tracts and census data, which is important for assessing changes in the neighborhoods of voucher users; with exact addresses, point-to-point moves can be examined and census tract neighborhood characteristics can be merged and analyzed. Prior address would be particularly useful for identifying the new voucher recipients who lease in place. While line 12b ('move into this unit') is meant to capture whether a move was involved, we have found a surprisingly high share of new admissions who report not moving are leasing in a different ZIP Code than their reported prior ZIP Code.³ In its current form, the 'move' variable (12b) is not usable and HUD is unable to determine which voucher recipients lease in place.
- HUD could also consider re-wording 12.b from "Is family now moving to this unit?" to "Is family remaining in prior unit?"

Section 5: Unit to be Occupied on Effective Date of Action

Additional suggested changes:

- While the speed and burden of housing quality inspections is raised as a key barrier to landlord participation, HUD currently receives no information on inspections from PHAs. There is, however, relevant information already collected by PHAs in the Request for Tenancy Approval form (an OMB form, so standardized across PHAs).
- We recommend adding line 3 ('requested lease start date') and line 8 ('date unit available for inspection') of the Request for Tenancy Approval form to Section 5 of the 50058, to pair with 5g, the date when the unit last passed inspection. This would enhance HUD's ability to assess the timeliness of inspections and the lease-up process, a key dimension of program performance.
- In terms of potential added burden, we note that line 5j already requires PHAs to reference and incorporate data from the Request for Tenancy Approval form.

³ Of successful searches from 2015-2019 who report not moving, just under half lease up in a different ZIP Code than the prior ZIP Code provided.



Section 12 Housing Choice Vouchers: Tenant Based Vouchers

Proposed changes we particularly support:

- Adding 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;
- If the family received a higher payment standard as reasonable accommodation;
- (from MTW expansion), if there were additional Payments, not HAP Payments, for tenant-based voucher family
- And financial incentives for property owners.

Thank you for the opportunity to provide these comments

A handwritten signature in blue ink that reads "Katherine O'Regan".

Katherine M. O'Regan
Faculty Director
NYU Furman Center

A handwritten signature in black ink that reads "Ingrid Gould Ellen".

Ingrid Gould Ellen
Faculty Director
NYU Furman Center