



April 10, 2023

Department of Housing and Urban Development
451 7th St. SW
Washington, DC 20410
Submitted electronically through regulations.gov

Re: Docket No. FR-7076-N-05, 60-Day Notice of Proposed Information Collection: Family Report, MTW Family Report, MTW Expansion Family Report; OMB Control No. 2577-0083

Dear HUD:

The Tacoma Housing Authority (THA) appreciates the opportunity to provide public comment on the proposed changes to HUD Form 50058 (i.e., the 50058). THA will not be commenting on each proposed change; rather, we will provide comment on the changes that most impact our work, either positively or negatively. Furthermore, THA would like to express support of the Moving to Work (MTW) Collaborative's comments on these proposed changes, as they are aligned with our comments below.

THA Welcomes the Changes Proposed in the Following Sections:

Related to Section 2: Adding action codes and questions to explain reasoning for EOP or Interim Reexamination

- THA supports the following changes, as they would provide more detailed response options that could be helpful for analyzing outcomes:
 - Adding Code for PBV Transfer to Tenant-Based Voucher
 - Adding List of Interim Reexaminations
 - Adding End of Participation List:
 - Please note THA supports adding this list, however, we'd encourage HUD to review the full list of response options and streamline the categories so there are not a dozen fields from which to choose. It would be helpful for HUD to clarify its intended use cases for this data and pare down the response options based on those reasons.

Related to Section 3: Updating Field from Sex to Gender & Other Updates to Race and Disability Status

- THA supports updating the field from sex to gender and adding the suggested response options for non-binary, trans, and no response. There should also be a response option for "Other." It should be known that the current 50058 explanation (for the MTW Family report) for line 3g (Sex) states: "Indicate the gender of each household member (M=Male, F=Female)" which seems to conflate sex and gender. Thus, if HUD is interested in capturing gender, THA fully supports more inclusive reporting to better align with how people may prefer to share their gender identities beyond the male or female binary response options.
 - THA recommends that the HUD PIH Office collaborate with other HUD offices looking to make similar changes to be more aligned and inclusive in data collection as our work is often cross-sector and cross-departmental. We highlight a couple of HUD SNAPS resources below:



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- *(HUD) Community Support to Gather Feedback on Proposed Changes to the Race, Ethnicity, and Gender Identity HMIS Data Elements:*
<https://files.hudexchange.info/resources/documents/Community-Support-to-Test-Proposed-Changes-Race-Ethnicity-Gender-English.pdf>
 - *(HUD) Client-Centered Approach to Recognizing Gender Identities in Data Collection:*
<https://files.hudexchange.info/resources/documents/Client-Centered-Approach-to-Recognizing-Gender-Identities.pdf>
- THA supports including a new code “Other” to the Race question, as this gives people more response options that may closer align with their racial identity. THA also supports adding to the Disability question a new code “No Response.” Additionally, note that we fully support richer race & ethnicity fields and encourage HUD to look beyond the OMB-required five race categories: White, Black or African American, American Indian or Alaska Native, Asian, and Native Hawaiian or Other Pacific Islander. THA is currently advocating with its software vendor to provide more options and adding fields that could make our data collection efforts for race and ethnicity more inclusive and representative of the populations we serve. Ideally, THA would like to align its response fields with HUD as much as possible; and, we are making proactive steps to move this forward in 2023 for purposes of equity and inclusion in our data collection.
 - Importantly, for all demographic data, especially data that is collected on one’s marginalized identity(ies), such as for BIPOC or LGBTQ+ people or people with disabilities, etc. we would want assurances from HUD regarding how this data is protected and how this information is used. There is reasonable concern that this data may be used to inadvertently target people based on political aims, if accessed for the wrong reasons. THA recommends that HUD shares more resources to PHAs that encourage responsible and client-centered data collection from a DEI lens.

Related to Section 12: Housing Choice Vouchers: Tenant Based Vouchers

- THA agrees with HUD’s proposal to remove the question that asks if the family qualifies as “Hard to House.” THA Agrees on the removal of this language, as it could be subjective and the purpose for collecting this data was unclear.

THA Cautions Against These Changes Unless There is More Clarity or Explanation From HUD:

Related to Section 2: Removing Historical Adjustment Code Action

- THA would like more clarity on the removal of the Historical Adjustment code and if there will be any other methods of documentation or functionality to take its place (e.g., new advancements in the Housing Information Portal). The Historical Adjustment code has been immensely helpful for THA staff to document situations where there have been old errors we need to void. THA would have concerns if, due to the removal of this code, there is not a way to rectify past errors made in the system.



Related to Section 2 & Section 17: Changing Heading to Read “Supportive Services Programs”

- THA needs more clarity from HUD about who is included in the universe of clients on which we need to collect and report this data in the 50058 for supportive services. If this field is changing from FSS participants and expanded to a larger group of people, what is the minimum level of supportive services someone must have received for PHAs to report this data? And is it for services administered by PHA staff or affiliated service partners? As part of THA’s MTW flexibilities, THA offers case management and housing stability supports for households. Some of this assistance is a one-time touch point (e.g., de-escalation or referrals), and other touch points may be longer-term. Reporting on all these interactions at the household-level would be overly burdensome for collecting and reporting this data and it would be unnecessarily duplicative, since THA, like many other entities offering supportive services, uses a separate, case management-focused software to track outcomes. Overall, we believe expanding this field would pose as an additional data collection burden that would limit THA’s flexibility administering services in an individualized, client-centered way. We urge HUD to think intentionally about this and provide clear explanations on their purpose for this data collection and the necessary programs required to be reported for this field.

Related to Section 3: Requesting Data on Sexual Orientation

- THA seeks more information from HUD regarding its intentions to collect this data and how HUD sees this information improving PHAs’ administration of housing and services in the near future. We understand that collecting this data could help HUD and PHAs identify gaps and disparities in outcomes for serving LGBTQ+ individuals; however, we recommend a larger discussion between HUD and LGBTQ+ advocacy organizations to consider if this information is vital at program enrollment. THA is concerned that collecting this data, especially without the right level of education and messaging from HUD on data privacy and responsible data collection, may be too intrusive. This concern would be mitigated if we knew this data would be used to directly enhance services and strengthen housing stability more immediately (e.g., with the expectation of more funding based on service needs). Additionally, as we described above in the section on the updated gender field, THA wants assurances from HUD on the protections of this data, especially due to the current hostile environment against LGBTQ+ rights nationally.

Related to Section 4: Background at Admission

- For HUD’s proposal to ask if a family was formerly homeless, THA would like HUD to clarify if this will be replacing the current field for 4c ‘Homeless at Admission’ or if this will be required in addition to question 4c. If HUD is seeking to collect both data points, THA wants to understand the utility of asking both questions, especially since the current phrasing of question 4c has historically been challenging in terms of ensuring accurate and complete reporting by PHAs. HUD also needs to be clear in the definition of “homeless” they are using for this question. THA encourages HUD to change the way this question is asked so it can be easier for both the household providing the information and program staff collecting the response. For example, people may be more likely to respond to the question “where did you sleep last night?” and offering descriptors of what location types could be used to address this question.



Tacoma Housing Authority

Executive Director
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- For HUD's proposal to ask if a family transitioned out of an institutional setting, HUD should clarify the definition and provide examples for what's considered an institutional setting.

Related to Section 5: Providing for the type of accessible unit identified by the PHA

- THA would like more clarification from HUD on the purpose providing the type of accessible unit and what HUD intends to do with this information; after all, there is an existing field to mark whether the unit is accessible.

Related to Section 12: Housing Choice Vouchers: Tenant Based Vouchers

- HUD is proposing to add more fields to understand whether a family received mobility-related services or if a security deposit was paid by the PHA on behalf of the family. THA seeks more clarity from HUD on its intent and expectations for collecting this information, as this may pose as a burden if HUD expects this field to be completed through other data or documentation sources beyond client self-report.
 - What is the definition that HUD is using for mobility-related services?
 - What is the purpose of collecting data on whether a security deposit was paid by the PHA? Must PHAs report on non-HUD sources that were used to help provide this security deposit assistance for households, or what is the expectation? We see this as a major administrative burden to track this data in the 50058 Form, especially since PHAs already have other financial tracking mechanisms in place to ensure funds are being used to assist households based on local- and non-HUD-funded grant requirements.

Thank you for considering our perspective and reviewing our comments.

Sincerely,

TACOMA HOUSING AUTHORITY