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Yardi Systems, Inc. is a property software company that provides software for approximately one third of the PHA families in the United States.

Thank you for the opportunity to provide additional feedback on the 50058, 50058 MTW, and 50058 MTW-EX proposed form changes.

We want to strongly discourage the introduction of new action types and advocate for the use of reason fields for the interims and data extrapolation for the Project Based Voucher to Housing Choice Voucher transfers. The addition of new action types will create significant delays to implementation.

There are discrepancies between the narrative in the Federal Register notice and the additional fields added to the forms. We are concerned that the proposed 50058 form instructions do not seem to contain detailed information on the use/context of all the new fields.

Software vendors need to understand the business rules that should accompany these changes so that we can enforce appropriate data entry to meet HUD's data collection requirements. We encourage HUD to provide software vendors, industry groups and trainers an opportunity to review and provide feedback and upcoming changes so that we can help identify operational questions and challenges that may be introduced.