

**Archived:** Wednesday, May 1, 2024 1:43:47 PM

**From:**

**To:** [cnguyen@tacomahousing.org](mailto:cnguyen@tacomahousing.org)

**Subject:** RE: Comment from Tacoma Housing Authority (60-Day Notice of Proposed Information Collection: Form 50900, OMB Control No.: 2577-0216)

**Importance:** Normal

**Sensitivity:** None

---

Thank you for your comments and general support for removing the standard metrics and providing narrative options to MTW PHAs. We will continue to work with the MTW Collaborative in determining alternative outcome measures that can be meaningful while minimizing burden. Please see the responses below to some specific comments, and please look out for the 30 day PRA Notice in the coming weeks which will have some additional updates, some based on public comments we have received:

- **Comment:** With regard to the accuracy of the agency's estimate of the burden of the proposed collection of information, THA believes 33 hours per plan or report per year is a significant underestimate of the time required to complete the HUD Form 50900 requirements. THA believes this time could easily be tripled for the MTW plan, taking into the consideration the collective staff time for developing and updating MTW activities and submitting the corresponding impact analyses, and taking time for meaningful stakeholder engagement which includes staff feedback and public comment. Likewise, for the MTW report, THA believes the time estimate of 33 hours can be doubled, taking into consideration the ad hoc methods to measure and report data for the standard metrics.

**Response:** Thank you for your comment. HUD believes if a PHA is completing purely the required information on the Form that on average 66 hours is adequate. While past significant revisions to the Form have created additional work for PHAs as they have transitioned to revised format, these 2024 revisions to the Form are not significant and should still result in a lower overall burden. HUD does understand that many MTW Agencies use the Annual MTW Plan and Annual MTW Report as more than a reporting tool to HUD. In many communities, these documents provide broader and more detailed information than is required in the Form, in order to communicate with local stakeholders regarding the overall programs and operations of the PHA. However, this is not required and is done at the discretion of each PHA.

---

**From:** Christine Nguyen <[cnguyen@tacomahousing.org](mailto:cnguyen@tacomahousing.org)>

**Sent:** Tuesday, February 13, 2024 5:37 PM

**To:** Paperwork Reduction Act Office <[PaperworkReductionActOffice@hud.gov](mailto:PaperworkReductionActOffice@hud.gov)>

**Cc:** Pollard, Colette <[Colette.Pollard@hud.gov](mailto:Colette.Pollard@hud.gov)>

**Subject:** <External Message> Comment from Tacoma Housing Authority (60-Day Notice of Proposed Information Collection: Form 50900, OMB Control No.: 2577-0216)

**CAUTION:** This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe. If you have concerns about the content of the email, please send it to [phishing@hud.gov](mailto:phishing@hud.gov) or click the Report Phishing Button on the Outlook ribbon or Phishing option within OWA.

Dear HUD,

The Tacoma Housing Authority (THA) would like to submit its support for the removal of the Standard Metrics from the HUD Form 50900, as described in the [60-Day Notice of Proposed Information Collection: Form 50900: Elements for the Annual Moving To Work Plan and Annual Moving To Work Report; OMB Control No.: 2577-0216](#).

THA is one of the initial 39 MTW agencies. THA supports the recommendations of the MTW Collaborative and is in agreement

that HUD continue working with MTW agencies and the MTW Collaborative on a mutually agreed upon set of alternative performance metrics to communicate the efficacy of the MTW demonstration. The standard metrics in the HUD Form 50900 are overly burdensome and provide limited utility for THA to measure the effectiveness of its programs overall. This is especially true more recently, when in 2023, THA instituted a more holistic set of agency performance measures to understand how its programs were operating compared to THA's agency goals—for which its MTW activities and flexible funding capacities are vital.

Finally, with regard to the accuracy of the agency's estimate of the burden of the proposed collection of information, THA believes 33 hours per plan or report per year is a significant underestimate of the time required to complete the HUD Form 50900 requirements. THA believes this time could easily be tripled for the MTW plan, taking into the consideration the collective staff time for developing and updating MTW activities and submitting the corresponding impact analyses, and taking time for meaningful stakeholder engagement which includes staff feedback and public comment. Likewise, for the MTW report, THA believes the time estimate of 33 hours can be doubled, taking into consideration the ad hoc methods to measure and report data for the standard metrics.

THA appreciates the opportunity to submit public comment and is eager to continue participating in these discussions with HUD and the MTW Collaborative to streamline reporting.

Sincerely,  
Christine Nguyen  
MTW Coordinator for Tacoma Housing Authority

**Christine Nguyen** | *she/her*  
Planning and Policy Analyst  
Policy, Innovation, and Evaluation  
Tacoma Housing Authority  
902 S L St., Tacoma, WA 98405  
(253) 274-5581 | [www.tacomahousing.org](http://www.tacomahousing.org)