



Colette Pollard, Reports Management Officer
Department of Housing and Urban Development
Submitted via electronic mail to PaperworkReductionActOffice@hud.gov

Subject: Public Comment: OMB Control No.: 2577-0216; Proposed Information Collection: Form 50900: Elements for the Annual Moving to Work Plan and Annual Moving to Work Report

Dear Reports Management Officer Pollard,

The San Diego Housing Commission (SDHC) appreciates the opportunity to provide comments regarding the U.S. Department of Housing and Urban Development's (HUD) Notice on the Proposed Information for Form 50900: Elements for the Annual Moving to Work Plan and Annual Moving to Work Report.

SDHC is a Moving to Work (MTW) agency and is required to submit the Annual MTW Plan and Annual MTW Report, also known as the HUD Form 50900, in lieu of the standard annual and five-year public housing authority (PHA) plans. SDHC supports the removal of the standard metrics within the HUD Form 50900 and the addition of the optional narrative, self-reported PHA data, and participant success stories. However, SDHC recommends that HUD continue to work with the MTW Collaborative and the MTW agencies on the data HUD proposes to compile in lieu of the standard metrics to ensure that HUD and MTW agencies agree with the metrics and how they are conveyed to demonstrate progress toward the three MTW statutory objectives.

Below are SDHC's responses to the following prompts included in the HUD notice:

1. Whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information will have practical utility;

Removing the standard metrics will not negatively affect SDHC's performance of its functions.

2. The accuracy of the agency's estimate of the burden of the proposed collection of information;

The notice underestimated the burden per year per respondent, given the number of implemented activities in SDHC's MTW Plan. The number of hours to prepare the "Ongoing MTW Activities" will likely exceed 10 hours even with the removal of the standard metrics, given the number of implemented activities in SDHC's MTW Plan. The number of hours also does not include the time it takes to complete the required public comment process for the MTW Plan.

3. Ways to enhance the quality, utility, and clarity of the information to be collected; and

SDHC recommends that HUD work with the MTW Collaborative and MTW agencies to determine what specific information should be collected to demonstrate progress toward the MTW statutory objectives.

4. Ways to minimize the burden of the collection of information on those who are to respond; including annual reporting based on the activities performance as related to the MTW program statutory objectives and through the use of appropriate automated collection techniques or other forms of information technology, e.g., permitting electronic submission of responses.

Removing the standard metrics and including an option to include narrative, participant success stories, and PHA reported data will significantly minimize the burden of the collection of information on MTW agencies. Continuing to allow for electronic submission of MTW Annual Plans and Reports will also continue to minimize administrative burden.

Thank you for your consideration of SDHC's comments.

Sincerely,

DocuSigned by:

Lisa Jones

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Lisa Jones
President & Chief Executive Officer
San Diego Housing Commission