



February 9, 2024

Colette Pollard, Reports Management Officer, REE
Department of Housing and Urban Development
451 7th Street SW, Room 8210
Washington, DC 20410–5000
Via electronic submission to PaperworkReductionActOffice@hud.gov

RE: *Form 50900: Elements for the Annual Moving To Work Plan and Annual Moving To Work Report*
Docket No. FR-7076-N-18
OMB Control No.: 2577-0216

To Whom It May Concern:

Home Forward welcomes the opportunity to provide comments to the Department of Housing and Urban Development (HUD) on the above-referenced proposal to revise the HUD Form 50900 (Proposal). While we commend HUD on prioritizing reducing reporting and administrative burden on Moving to Work (MTW) public housing authorities (PHAs), the current Proposal lacks specifics on how HUD will revise the form or which HUD systems it intends to pull already reported data from. The vagueness of this change is concerning; the impacted agencies, residents, and the public must be provided an opportunity to review the specific proposed changes to Form 50900 before it is approved.

Home Forward is the largest provider of affordable housing in the state of Oregon and one of the “Initial” 39 MTW PHAs. Since 1998, Home Forward has used our MTW flexibility to ensure the people of our community are sheltered. The Annual MTW Plan and Report are important tools to inform HUD, residents, and the public of progress towards our mission. While certain elements of the existing Form 50900 are burdensome for PHAs to report on, consistency to reporting is critical for HUD to analyze and understand what is working – and what isn’t – for MTW agencies.

One of the more concerning aspects of the Proposal’s lack of specifics is that HUD will pull data already reported by MTW PHAs through required HUD systems. It is unclear which HUD systems are available to report the amount of data the MTW PHAs report on in the MTW Report. Many of these metrics aren’t data that can be gathered on existing HUD systems such as FDS, PIC, or VMS. Further, some activities that Home Forward reports on are almost entirely dependent on external systems that HUD does not have access to. While we support the principle of simplifying and streamlining reporting, without some specifics as to which system(s) HUD will use for the various metrics, the Proposal raises serious concerns about how HUD will utilize and aggregate the already reported data.

For instance, HUD could elect to calculate its Substantially the Same Assessment using HUD data pulls rather than relying on self-reported agency data. For Home Forward, this would result in a gross misrepresentation of our agency’s true impact. If HUD were to conduct this



assessment based solely on data already available via existing HUD systems, this critical MTW requirement that we serve substantially the same number of households would exclude a number of households we serve via local programs enabled by our MTW flexibilities that are not reported in any existing HUD systems. This is just one example of the risks of HUD relying on already reported data.

From an evaluation standpoint, eliminating previously required standard metrics and giving MTW PHAs the option to share self-reported data may complicate HUD's ability to analyze standard metrics across the MTW PHAs. Given that MTW provides the opportunity to design and test innovative strategies, it is important that evaluation is ongoing. Even amongst the initial 39 agencies, self-reported data likely varies greatly. HUD's ability to assess which MTW strategies are resulting in successful outcomes and scale those policy interventions to other PHAs across the country is central to the program's impact.

In sum, the vagueness of this Proposal creates questions and concerns that HUD must address before proceeding with changes to the Form 50900. While Home Forward supports reducing administrative and reporting burdens on MTW agencies, we urge HUD to provide the opportunity to review the specific changes being proposed and to clarify which existing HUD systems will be utilized in MTW reporting.

We appreciate the opportunity to comment.

Sincerely,

Terren Wing
Director of Strategy & Federal Policy