

Archived: Wednesday, May 1, 2024 11:25:41 AM

From:

Sent: Thursday, March 7, 2024 12:44:18 PM

To: Terren.Wing@homeforward.org

Subject: RE: Home Forward Comment - Form 50900: Elements for the Annual Moving To Work Plan and Annual Moving To Work Report; 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 received:

Comment: 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

Response: "Thank you for your comment. The decision to remove previously required standard metrics was made in collaboration with the MTW Collaborative and was based on feedback we have received from HUD's Office of Policy Development and Research and other stakeholders, with concerns on verifiability and lack of consistency in the data being reported, and the challenges with reporting on metrics at the specific MTW activity level (overall outcomes may be attributed to a variety of MTW PHA initiatives)".

Comment: 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.

Response: "Thank you for your comment. There is no plan to use this data for STS or any other means of assessing or comparing agencies. The goal is to report out on outcomes as they relate to the 3 MTW Statutory objectives. The development of the database will be done transparently in collaboration with the MTW Collaborative and other stakeholders".

Comment: 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...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.

Response: “Thank you for your comment HUD will continue to work in tandem with the MTW Collaborative to develop alternative MTW activity outcomes that can support the 3 MTW Statutory Objectives using systems data and to provide outcomes on a more macro level. The outcomes will be publicly available on HUD's MTW website in a database format where public users can pull outcomes by PHA. HUD will continue to work with the MTW Collaborative to determine specifications of this database as they have yet to be fully determined. Various stakeholders have agreed that due to the granularity and complexity of specific MTW activities, reporting on outcomes at an activity level may not be adequately showcasing overall outcomes that an MTW PHA may be achieving with a variety of initiatives. MTW PHAs may still choose to report on individual activities using the old metrics or its own agency metrics, but it is no longer required”.

From: Terren Wing <Terren.Wing@homeforward.org>

Sent: Friday, February 9, 2024 3:33 PM

To: Paperwork Reduction Act Office <PaperworkReductionActOffice@hud.gov>

Subject: <External Message> Home Forward Comment - Form 50900: Elements for the Annual Moving To Work Plan and Annual Moving To Work Report; OMB Control No.: 2577-0216

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To Whom It May Concern:

Please find attached Home Forward's comment regarding the referenced proposal.

Sincerely,

Terren Wing

Director of Strategy & Federal Policy

Pronouns: she/her ([learn more](#))



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