

Archived: Wednesday, May 1, 2024 11:35:45 AM

From:

Sent: Thursday, March 7, 2024 10:19:48 AM

To: rkangas@hacsb.com

Subject: RE: Public Comment - 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: HACSB welcomes the flexibility to use local metrics and other methods to measure active MTW activities as they may demonstrate more accurate outcomes of the activity, as some of the current standard metrics do not capture the true outcome of the activity. For HUD's proposed process of in lieu of agency-reported standard metrics, HUD will pull data already reported by the agencies through required HUD systems (such as the 50058), HACSB has concerns as to how and what data would be pulled to derive MTW activity outcomes. Many of the initial 39 MTW PHAs have unique initiatives of which the concern is of how outcomes would be accurately reported through a HUD electronic system. Also, would these outcomes be published for public access and if the MTW PHA has a question of the outcomes will there be a discrepancy resolution process to address those concerns? Lastly, for outcomes derived from HUD electronic systems, how will HUD distinguish customers participating in the various activities?

Response: Thank you for the 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.

Comment: HACSB does not believe the notice's accuracy of the agency's estimate of burden of 66 hours for the proposed collection of information of the Annual MTW Plan and MTW Report combined is accurate. In the event the standard metrics are eliminated, it is anticipated the administrative burden of the Annual MTW Plan and Annual MTW Report will still far exceed 66 hours. Both the Plan and Report are multi[1]month projects that is coordinated by a full-time analyst and supported by many staff. For the Report, for two metrics, HACSB conducts a time-study to measure staff time savings for eight of our activities, for this process only, at a minimum, account for approximately 20 hours, from organizing the time study, staff participating in the study, data collection, analysis, and summary of the data.

Response: "Thank you for the 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."

Comment: Eliminate reporting on elements in Section II: General Operating Information of form 50900 of the MTW Report for information on Actual Households Served and Comparable Mix as this information can and is being derived from other in-place HUD reporting systems.

Response: “Thank you for the comment. Once the Housing Information Portal (HIP) is up and running, HUD will determine whether this information can be collected through it. However, local, non-traditional household data will not be reported in HIP by initial MTW PHAs and must be collected in Form HUD 50900”.

From: Renee Kangas <rkangas@hacsb.com>

Sent: Tuesday, February 13, 2024 11:06 AM

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

Subject: <External Message> Public Comment - OMB Control No.:2577-0216

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Hello,

Attached are comments regarding proposed revisions to Form 50900: Elements for the Annual Moving To Work Plan and Annual Moving To Work Report; OMB Control No.: 2577-0216.

Thank you.

Renee Kangas

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