

Archived: Wednesday, May 1, 2024 9:44:11 AM

From:

To: jschau@vhausa.com

Subject: RE: 60-Day Notice MTW Plan/Report Form 50900 OMB 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 (on burden hours): This is an underestimate, the collection of information is more costly because typically there are Plan Amendments that have to take place (just given the nature of how plans change over time), which aren't accounted for here; in addition, since we collect information from various parties and then need layers of approval and review, it takes substantially longer than 33 hours per Report or Plan when all contributors' time and costs are taken into consideration

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."

Comment: Streamline as you're already intending to do, and allow for electronic submission when at all feasible. Consider a template that has fillable tables so we're not designing and adjusting custom formatting if not absolutely necessary (ie design a template that is not a PDF with model tables, but one with adaptable tables and narrative sections that can be completed in the PDF proper)- this will allow for more consistency across MTW Agencies, too.

Response: "Thank you for the comment. HUD is moving to an online collection template for the PHA Plan and we will explore whether this is feasible for the MTW Plan and Report. We have heard from other MTW PHAs that a fillable PDF would not work for them given the many unique aspects of MTW programs at the 39 MTW PHAs".

From: Jamie Schau <jschau@vhausa.com>

Sent: Friday, December 15, 2023 1:32 PM

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

Subject: <External Message> 60-Day Notice MTW Plan/Report Form 50900 OMB No.: 2577-0216

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Hi Colette,

I am writing to submit our comments regarding the Form 50900: Elements for the Annual Moving To Work Plan and Annual Moving To Work Report; OMB Control No.: 2577–0216. Please find responses to the questions asked below in red.

- (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;
We support the removal of required metrics in the Annual Report. The required metrics do not always represent the impact of activities. Particularly relating to financial metrics: baselines remain the same, but over time costs increase and measurements against the baseline become meaningless.
- (2) The accuracy of the agency's estimate of the burden of the proposed collection of information;
This is an underestimate, the collection of information is more costly because typically there are Plan Amendments that have to take place (just given the nature of how plans change over time), which aren't accounted for here; in addition, since we collect information from various parties and then need layers of approval and review, it takes substantially longer than 33 hours per Report or Plan when all contributors' time and costs are taken into consideration.
- ...
- (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.
Streamline as you're already intending to do, and allow for electronic submission when at all feasible. Consider a template that has fillable tables so we're not designing and adjusting custom formatting if not absolutely necessary (ie design a template that is not a PDF with model tables, but one with adaptable tables and narrative sections that can be completed in the PDF proper)- this will allow for more consistency across MTW Agencies, too.

Please let me know if you have any questions.

Thank you.

Jamie Schau
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