



Seattle Housing Authority

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Submitted via <https://www.reginfo.gov/public/do/PRAMain>

Re: 30-Day Notice of Proposed Information Collection: Form 50900: Elements for the Annual Moving to Work Plan and Annual Moving to Work Report, OMB Control No.: 2577-0216 (Docket No. FR-7080-N-19)

To Whom it May Concern:

The Seattle Housing Authority (SHA) has participated in the Moving to Work (MTW) demonstration program for over 25 years. During that time, we have been active collaborators with the US Department of Housing and Urban Development (HUD) in the creation of reporting requirements, evaluation measures and other means of providing both HUD and the general public useful information regarding SHA's use of MTW regulatory waivers and funding flexibility. We have appreciated HUD's willingness to collaborate with the initial 39 MTW agencies on these matters and look forward to continued partnership. As such, SHA is using the public comment period on the *Form 50900: Elements for the Annual Moving to Work Plan and Annual Moving to Work Report* to share our new and continuing ideas for improving MTW reporting requirements.

SHA would like to thank HUD for your detailed response to our comments on the 60-Day Notice on this same matter posted in December 2023, and particularly in the changes made in response to those comments and the transparency demonstrated in responding point by point.

In general, SHA concurs with the comments provided by the MTW Collaborative on this matter. This letter organizes SHA's additional comments section by section.

## **General Comments**

Thank you for removing the HUD Standard Metrics. As reflected in the updated Average Hours per Response, this will be a significant reduction in administrative burden for the initial MTW agencies. This is also an excellent example of the strong partnership between HUD/the national MTW office and the initial 39. We are looking forward to further discussions on the proposed evaluation metrics moving forward, and are hopeful that these talks will result in a product that helps tell the success of the MTW program nationally.

## **Section by Section Comments**

### Section II: General Operating Information

#### *II(A)(v) Planned other changes to housing stock anticipated during the Plan Year*

HUD has updated the instructions to this section to read “examples of the types of other changes can include...changes to designated housing plans [DHPs] and/or accessibility features of developments or units.” As mentioned in our previous comments on the 60-Day Notice, we do not believe that the Form 50900 is the appropriate mechanism through which to measure compliance regarding DHPs or accessibility features, as these both have their own processes. We appreciate that the language makes including this information optional.

#### *II(B) Leasing Information*

HUD has updated the reporting for planned/actual households served and leasing issues to include Special Purpose Vouchers (SPVs). SHA is not necessarily opposed to the inclusion of these vouchers in our leasing totals, but would like to know why HUD thinks this is the best way to reflect SHA’s households served. SPVs are not MTW units, so it is not immediately clear why they would be included in a document specifically designed to “evaluate the impacts of Moving to Work activities.” HUD has already created a voucher utilization dashboard which is publicly available, and having yet another method of calculating MTW utilization (in addition to the Substantially the Same calculation, which is yet a third calculation method of the number of households served and which, for SHA, includes some but not all SPVs) could be very confusing for the public to understand. If HUD does decide to include SPVs in this section, we propose that there be another row in the two tables (*II(B)(i) Planned/Actual number of households served* and *II(B)(ii) Discussion of any anticipated/actual issues/solutions related to leasing*) specifically for SPVs, to disaggregate them from the MTW vouchers. This would also help explain the differences in leasing success between tenant-based and project-based vouchers and Special Purpose Vouchers, since we know SPVs can be much more difficult to lease up in certain markets.

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*II(B)(iii) Unique households served*

Thank you again for responding to feedback on the proposed 50900 and adding this (optional) section to highlight the unique households served in Local, Non-Traditional units.

Thank you for your attention to these comments and suggestions. Please contact Lily Sweeney, at [lily.sweeney@seattlehousing.org](mailto:lily.sweeney@seattlehousing.org) should you have any questions or other follow-up matters.

Sincerely,

Lily Sweeney  
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