

July 15, 2011

Colette Pollard  
Departmental Reports Management Officer  
QDAM  
Department of Housing and Urban Development  
451 7<sup>th</sup> Street SW, Room 4160  
Washington, DC 20410-5000

Re: Moving to Work Demonstration proposal, OMB Control Number 2577-0216

The Council of Large Public Housing Authorities (CLPHA) appreciates that HUD is using their Form 50900 renewal process to make MTW-agency-requested revisions to the form. The goal of these revisions, providing a better way for MTW participants to report on all of their activities in a standard way, is an important one. CLPHA understands that this type of standard reporting is essential to sharing the full story of the impacts that these agencies are having in their communities. The proposed revisions, however, still fail to account fully for the widely varying operations of MTW agencies. The following comments highlight elements of the proposal that are overly limiting and will thus interfere with the goal of collecting full information about MTW activities or with the wider goals of the MTW program itself.

Page 1. CLPHA encourages HUD to reassess the burden hours for the finalized new form. MTW agencies spend a great deal more time than 81 hours on preparing their annual Plans and Reports.

Page 3. First, though the form now refers to units occupied/leased in the households served category, the definitions still refer to households rather than units. Further, the definition of Housing Choice Voucher Households refers only to households that receive rental assistance paid for with MTW funds. However, in later sections, respondents are asked for numbers for non-MTW HCV units. Thus, the definition cannot solely refer to MTW-funded units.

Additionally, CLPHA had previously expressed concern that not all local non-traditional MTW programs can be described in terms of authorizing a particular number of subsidies. In some sponsor-based program arrangements, for example, the PHA provides a program partner with a fixed amount of funding to be used as short-term rental assistance for a target population. The number of subsidies that will be provided will depend on the extent of the need of the program participants and the speed with which they transition off of the rental assistance. HUD has indicated that in such cases, the agency should provide an estimate or a minimum of the number of households to be served. That guidance should be included in the definition of Local, Nontraditional MTW Units.

Finally, this is one of the areas in which the strict categorization of households fails to capture the breadth of the MTW agencies' efforts. Residents of MTW Public Housing Units or MTW or non-MTW HCV participants may be served by local, nontraditional services. However, there is nowhere in this form to report that information, so that innovation will not be recorded and brought to attention.

Page 9, Section II.2.B, Page 13, Section II.5.B. CLPHA appreciates that HUD has clarified that the annual numbers of households served are reflective of a point-in-time count at the end of the fiscal year. It is important to note, however, that this is not how annual numbers of households served are calculated for non-MTW agencies. The numbers collected by the revised form 50900 will thus not be directly comparable to annual numbers for non-MTW agencies.

Page 10, Section II.3.C and Page 14, Section II.6.C. We do not understand what "perspective" HUD hopes to gain by collecting raw numbers of waiting list families. Even if HUD does not intend to use these numbers to assess performance, other groups may, despite their extremely limited value in doing so. Waiting list numbers can vary depending on a number of factors, such as how recently the list was opened, how recently it was purged, etc. We do not see the goal of collecting these numbers.

Page 15, Section III.K, Pages 20-21, Section IV.A.5 and IV.A.6. CLPHA believes that requiring technical amendments and re-proposal of already-approved activities values form over substance. Agencies' Standard Agreements already provide them the specific authorizations included in their Attachments C and D. The purpose of these authorizations is "to delegate to the Agency the authority to pursue locally-driven policies, procedures and programs with the aim of developing better, more efficient ways to provide housing assistance and incentives to self-sufficiency to low, very-low, and extremely low-income families. The authorizations listed in this Attachment C are granted fully without requiring any additional HUD authorizations, as necessary to implement the activities described in the Annual MTW Plan." Activities should be approved if they are consistent with those Attachments C and D, regardless of which specific authorizations the activities require. More importantly, reauthorization should not be required for such a broad definition of "significant change," which could include any different impact on a tenant, regardless of the significance of that change in impact. Requiring reapproval could have serious detrimental effects on MTW agencies' ability to implement their plans and to adjust them to current community needs during their implementation, as processes are delayed, deals fall through, and community look for partners who can follow through in a timely manner. Agencies may further be hampered in their ability to improve the effectiveness of their programs as they develop. CLPHA recommends removing proposed language about reproposal of activities.

Page 21-26, Section V. Definitions are needed for all of the categorizations for sources and uses of funds, particularly if HUD intends them to be proscriptive. Additionally, a definition is needed for "reserve balances." There are a number of ways for agencies to calculate reserves.

FDS Instructions. CLPHA urges HUD to create a working group with MTW agencies to review and improve the FDS protocols. Although a previous focus group was consulted in the development of

this guidance, many agencies have reported challenges in implementation. FDS for MTW agencies still needs modification to make sense for the way that agencies keep their books.

Thank you for the opportunity to submit these comments.

Sincerely,

A handwritten signature in black ink, reading "Sunia Zatterman" with a long, sweeping horizontal line extending to the right.

Sunia Zatterman  
Executive Director