



Charlotte Housing Authority

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Collette Pollard, Reports Management Officer QDAM
Department of Housing and Urban Development
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Re: Document No. FR-5916-N-02, *60-Day Notice of proposed Information Collection: Form 50900: Elements for the Annual Moving to Work Plan and Annual Moving to Work Report* (the Notice)

Dear Ms. Pollard:

Thank you for the opportunity to provide comments on the proposed Form 50900. The proposed form provides only minor revisions to a standardized metrics system that imposes a “one size fit all” for MTW agencies. In many cases, the metrics are not applicable to the MTW activities.

It is important to note that the current and proposed form notes that the estimated burden per year, per MTW PHA, is 81 hours. Based on experience, this is understated. Additional administrative requirements have been included in the proposal, such as adding more categories to MTW “Households Served”. The reporting burden per year well exceeds 120 hours per year.

Standard Metrics

We are concerned that language has been added to give HUD the unilateral ability to assign metrics. The revised form notes that metrics will be required as assigned by HUD. We encourage a collaborative effort between HUD and the MTW PHAs to define the appropriate metrics based on the activity details.

Reproposal of Ongoing Activities

New language has been added which requires that activities with “significant changes” require a full rep proposal in the plan. The proposed form also requires an update on “non-significant changes” to all existing activities. The terms “significant changes” and “non-significant changes” have not been clearly defined which will add ambiguity in determining when a full rep proposal is needed.

Cost Determination:

It is often difficult to report costs of many MTW activities; therefore, requiring PHAs to project and reports costs for each MTW Activity by Financial Data Schedule (FDS) line item will create more of a challenge. This requirement imposes an undue burden of time and may result in data that is nothing more than an educated guess.

Sources and Uses

Based on the proposed form, PHAs would be required to provide more details regarding how funds are spent utilizing the funding flexibility. This weakens the use single fund flexibility, since one of the anticipated benefits of using a combined fund is having a simplified set reporting requirements. Two particularly burdensome additions are the new elements of the form that require that agencies provide a cost estimate for all new MTW activities and an explanation of how a surplus or deficit will be managed and the requirement that an agency provide a description of how using single fund flexibility responds to local needs by allocating funds at a higher or lower level than would be possible without single fund flexibility.

CHA believes that actively engaging the MTW PHAs in a discussion regarding the overhaul of Form 50900, will result in a more effective reporting tool that provides the data that is needed to better analyze the performance of the agencies. Thank you for consideration of these comments.

Sincerely,



A. Fulton Meachem, Jr.
President/CEO



Charlotte Housing Authority
Building Community, People & Partnerships