

May 2, 2016

Colette Pollard
Reports Management Officer, QDAM
Department of Housing and Urban Development
451 7th Street SW, Room 4176
Washington, DC 20410-5000



Karen DuBois-Walton, Ph.D.
Executive Director

Re: [Docket No. FR-5916-N-02] [OMB Control Number: 2577-0216] 60-Day Notice of Proposed Information Collection: Form 50900: Elements for the Annual Moving to Work Plan and Annual Moving to Work Report

Dear Ms. Pollard,

Elm City Communities/Housing Authority of the City of New Haven has been a Moving to Work Demonstration Program agency since 2000. We have embraced the opportunity to be innovative while demonstrating the effectiveness of the initiatives and documenting lessons learned. As such, we value the reporting requirements that must accompany any true demonstration project. Having never been fully satisfied with HUD's approach to the documentation of this important program, we were pleased to have the MTW agencies partner with Abt Associates to work collaboratively with HUD to develop appropriate evaluation measures.

To my knowledge, this work has been underway since 2012. Great effort has been invested and HUD has been kept abreast of the activities throughout. Therefore, it is with some measure of dismay that HUD releases a new version of the 50900 that is so similar to the current form and fails to reflect any input from the Abt version.

Given the urgency of HUD's timeline, it seems determined that the new 50900 approval process has been designed to limit the opportunity to make substantive changes. The work of the MTW/Abt Associates collaboration will require significant changes to the document. As such, the most prudent thing seems to be to provide a very time limited extension to the existing 50900 (although flawed, it is the process within which MTW agencies have become accustomed to reporting), with a clear directive to HUD to engage in the collaborative process hoped for to make more substantive changes to the document – changes that reflect the work of the MTW agencies/Abt Associates and HUD collaboration.

Further, HUD is urged to invest resource and energy into the development of an on-line reporting portal that will capture the information that HUD requires.

Thank you for consideration of these comments. I am available for further discussion and information at
Housing Authority of the City of New Haven's Elm City Communities
360 Orange Street, P.O. Box 1912, New Haven, CT 06511
(203) 498-8800 • TTD (203) 497-8343 • www.newhavenhousing.org

kdwalton@newhavenhousing.org or (203) 498-8800 ext. 1002.

Sincerely,

A handwritten signature in black ink, appearing to read 'KDW', with a long horizontal flourish extending to the right.

Karen DuBois-Walton, Ph.D.