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April 26, 2016

Collette Pollard, Reports Management Officer QDAM
Department of Housing and Urban Development
451 7th St SW., RM 4176
Washington, DC 20410-5000

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

Dear Colette Pollard,

The Housing Authority of the County of Santa Clara (HACSC) is submitting comments in response to the Department of Housing and Urban Development's (HUD) notice through the Federal Register dated March 1, 2016, regarding the proposed HUD-50900: Elements for the Annual Moving to Work Plan and Annual Moving to Work Report. Attached with this letter is a letter by the Moving to Work (MTW) Steering Committee responding to the draft revision of the HUD-50900 form. HACSC would like to express its support of the comments and concerns addressed by the MTW Steering Committee as they relate to the proposed HUD-50900.

In addition, HACSC has a few additional comments to the draft revised HUD-50900. Below are HACSC's comments with the cited Section and Subsection of the proposed HUD-50900 form.

Section: (II) General Operating Information, Annual MTW Plan and Annual MTW Report

Subsection: MTW Plan A. iv: Anticipated Existing Project Based Vouchers at the End of the Plan Year; MTW Report A. ii: Actual Existing Project Based Vouchers at the End of the Plan Year.

HACSC Comments: It would be helpful to have a clearer understanding of what HUD is looking for here. Does this include all of the projects with vouchers that are under a PBV HAP Contract? PHA's with a large PBV inventory often have numerous active PBV contracts (HACSC has over 55) and listing these each year will be time consuming. It would be easier to provide a count of the total number of PBVs instead of listing each project that has PBVs.

Section: (II) General Operating Information, Annual MTW Report

Subsection: D.i: 75% of Families Assisted Are Very Low Income

HACSC Comments: In reviewing the proposed 50900, a significant change was noticed, specific to the "income level breakdown of tenants served through local, non-traditional: tenant/property based and home ownership programs." Obtaining such specific income level data from properties in which HACSC issued a loan to develop affordable housing may pose a challenge.

The MTW Agreement mandates that at least 75% of the families assisted under the program are very-low income (income at or below 50% AMI). So, it is understandable why HUD would want to get a count of what percentage of households meets or exceeds the 50th percentile of the Area Median Income (very-low income), but to break income increments down further than that is administratively burdensome and we are not clear why HUD needs this information.

Section: (III) Proposed MTW Activities: HUD Approval Requested, Annual MTW Plan

Subsection: C. Cost Implications

HACSC Comments: In reviewing the proposed 50900, a significant addition was noted specific to the "Proposed MTW Activities" section. Currently, potential cost implications related to any and all proposed activities are factored into the MTW Annual Plan process.

However, the totality of the cost related to any given MTW Activity can only be roughly estimated. For example, in the FY2017 MTW Plan, HACSC is seeking approval to issue vacancy payments to landlords who re-rent their unit to a Section 8 participant—but the policy, including the decision on how much the vacancy payment will amount to, is still in development. Therefore, HACSC's cost implication estimate may change from Annual MTW Plan submittal to the actual implementation of the MTW Activity. To be clear, HACSC can project potential cost implications and management of the surplus/deficit—but doing so prematurely may create an administrative burden.

Thank you for your time and attention in reviewing our comments.

Sincerely,

A handwritten signature in blue ink, appearing to read "Katherine Harasz", is written over the word "Sincerely,".

Katherine Harasz
Executive Director

Cc: MTW Steering Committee Comments- Proposed HUD-50900 Revisions