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May 2, 2016

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

Re: Docket 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 Ms. Pollard,

The King County Housing Authority (KCHA) is writing to express several concerns regarding HUD's proposed revisions to Form 50900. HUD's changes will require reporting on information that is not vital to the proper performance or monitoring of MTW agencies and does not offer practical utility in the development of programs and policies. KCHA fully supports the development of a mechanism that will facilitate careful planning, reporting, and rigorous evaluation of the MTW demonstration. The revised version of Form 50900 fails again to accomplish these goals.

The purpose of Form 50900 is to create a standard reporting system to track and evaluate outcomes across MTW agencies. However, this purpose is not currently achievable as the standard metrics used to evaluate activities are problematic. The measures are often inapplicable to an activity and in some cases, impossible to measure, producing outcomes that lack integrity, rigor, and usefulness. The only slightly revised version of the form does nothing to address these fundamental issues, sustaining an ineffective measurement system for up to an additional three years. MTW agencies have been working with Abt Associates and the Housing Authority Insurance Group to develop a set of measures and an accompanying online portal that would more accurately and efficiently capture key outcome metrics across the thirty-nine MTW agencies. KCHA recommends building on this work to make substantial improvements to the form in collaboration with those who have extensive experience working within the current framework: the thirty-nine MTW agencies.

Though the form has been only slightly revised, the changes are significant and detract from the agencies' core MTW flexibilities. First, explicit language has been added that gives HUD the unilateral authority to assign metrics without any collaboration with the MTW agency. Historically, the collaboration between KCHA and HUD's MTW coordinator has allowed for the opportunity to offer additional context and provide a deeper understanding of an activity's aim, in turn allowing HUD to make a more informed decision when assigning metrics. If agencies must continue reporting on these one-size-fits-all standard metrics, they should be included in determining how these measures are applied.

Second, the definition of a rent reform activity has been broadened and can now be interpreted as including any change to the rent calculation and collection process, such as alternative recertification cycles. No clear guidance is provided on what constitutes a rent reform activity and accompanying impact analysis. In addition to this broad and unclear definition, the new form requires that an annual reevaluation of each rent reform activity be included in the report. This requirement should not apply retroactively to existing activities.

Finally, the form entails significantly more detail in reporting on the uses of the single fund flexibility, making it more onerous for agencies to utilize this central component of the MTW program. For example, agencies are required to provide a description of how they have used this flexibility to allocate funds at a higher or lower level than would otherwise be possible without the flexibility. This level of reporting is unnecessary and even duplicative as agencies are already reporting expenditures in the Financial Data Schedule.

Form 50900 is in need of a revision in order to facilitate the planning, reporting, and evaluation needed to advance the MTW demonstration. With the coming expansion of the MTW program, HUD has a unique opportunity to invest in a new version of the form that spurs innovation and information-sharing.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "K. EMM" with a stylized flourish at the end.

Katie Escudero

Moving to Work Policy Analyst