



May 2, 2016

Collette Pollard, Report Management Officer QDAM
Department of Housing and Urban Development
451 – 7th Street SW, Room 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 (the Notice)*

Dear Ms. Pollard:

Minneapolis Public Housing Authority (MPHA) is writing to express some concerns regarding the proposed collection of information. The Notice asks for public comment whether the proposed collection of information is necessary for the proper performance of the functions of the agency and on ways to enhance the quality, utility, and clarity of the information to be collected. MPHA agrees with the MTW Steering Committee that by proposing only relatively minor revisions to Form 50900, HUD would leave in place for up to three more years a document that in important respects detracts from rather than provides an accounting of the performance of MTW agencies and would do little to enhance the quality and utility of the information even though such an effort is needed.

The proposed form also does not take account of the substantial effort that the MTW PHAs, with the assistance of Abt Associates funded by the Housing Authority Insurance Group, already have made to develop evaluation metrics that more clearly and efficiently will reflect the critical work that MTW agencies do. There should be a short-term extension of the use of the current Form 50900 if necessary to allow time for development of substantial improvements based in part on the Abt work.

The following are concerns that MPHA has with the new Form 50900:

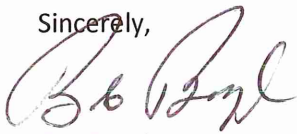
- HUD has added language giving it unilateral ability to assign metrics without any discussion with MTW agencies that might provide context about why or why not they might apply to the activity. In many cases these metrics have little to no connection to the activity or statutory objective and/or may be impossible to measure within the context of the activity.
- Benchmarks are made on an annual basis so they do not account for long-term impact.
- The focus on averages is insufficient in showing actual impact as they do not calibrate for different markets. 15 families moving to self-sufficiency in a small agency has a larger impact than in a large agency.
- The definition of Rent Reform causes concern as it broadens the definition to include almost everything that effects the rent calculation or cycle (i.e., biennial reviews, eliminating deductions, etc.)

- As noted in the NAHRO comments, MPHA has concerns regarding the proposed requirement to project and report costs for each MTW activity. The MTW Statute requires that MTW activities meet only one statutory objective. This presumes that all MTW activities have a financial objective – such a requirement creates additional work for MTW agencies.
- “Households Receiving Services Only” not included in determining substantially the same (Sts) (p3). At this time, there is no agreed-upon definition or formula for Sts so this may be a violation of the MTW Agreement.
- It seems redundant to require the inclusion of a Lobbying disclosure form when compliance with restrictions on lobbying required by 24 CFR Part 87 is included in the Certification of Compliance submitted with the annual MTW Plan.

Ways to enhance the quality, utility, and clarity of the information to be collected would be to create an online platform for entering metrics information (i.e., HAI Portal), track changes over time, create a more meaningful benchmark methodology, incorporate Sts, currently in a separate compliance Excel document, into the Report. This would provide more transparency and reduce administrative reporting burden on PHAs, and account for real time development, preservation, and disposition.

MPHA appreciates the opportunity to comment on the proposed changes to Form 50900 and hopes that the comments will be considered and there will be more collaboration with MTW agencies moving forward.

Sincerely,



Bob Boyd

Director of Policy and Special Initiatives

cc: Cora McCorvey, Executive Director/CEO