



April 27, 2016

Collette Pollard, Reports Management Officer QDAM  
Department of Housing and Urban Development  
451 7<sup>th</sup> 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:

On behalf of the MTW Steering Committee, a group of representatives of public housing agencies (PHAs) whose extensive discussions last year with HUD regarding the extension of their Moving to Work (MTW) Agreements included the subject of revisions to Form 50900, we are writing to express our 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. 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 is necessary for the proper performance of MTW agencies, and would not significantly enhance the quality and utility of the information even though such an effort is sorely needed.

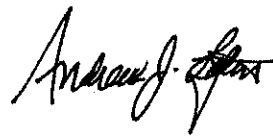
The MTW Steering Committee wholeheartedly supports responsible planning for and reporting of MTW PHA performance in a way that will facilitate full accountability and evaluation. The current Form 50900, as implemented by HUD, falls short of those goals by requiring application of a standardized set of metrics to MTW activities where they sometimes are partly or wholly inapplicable. There is also not a sense of scale, with MTW initiatives likely to have very large and very small impacts subject to the same metrics and reporting. These problems have led at times to meaningless or nonsensical results. The proposed form does nothing to correct this rigidity. 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.

In last year's discussions, the Steering Committee asked HUD to seek a short-term extension of the OMB approval for use of the current Form 50900 if necessary to allow time for development of substantial improvements based in part on the Abt work. While HUD did not agree to that proposal, HUD tentatively agreed to take comments from MTW agencies on the development and refinement of performance measures for the demonstration and on data collection and metrics soon after the majority of the Agreement extensions had been executed, and to consider seeking a new version of Form 50900 based on those comments.

We are concerned that HUD may be backing further away from a collaborative approach by moving forward with a slightly revised form. Moreover, in the new form 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. If HUD continues to push for one-size-fits-all standard measures, MTW agencies need to be included fully in their application.

In view of the critical need to overhaul Form 50900 so that it serves as a more effective planning and evaluation mechanism and results in less wasted effort and meaningless reporting, the Steering Committee again urges that a collaborative effort to that end with the MTW agencies commence promptly. Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Andrew J. [unclear]". The signature is fluid and cursive, with a large initial 'A' and a stylized 'J'.

MTW Steering Committee

Cc: MTW Agencies