



TACOMA HOUSING AUTHORITY

Michael Mirra
Executive Director

BOARD OF COMMISSIONERS

Stanley Rumbaugh, Chair
Dr. Arthur C. Banks, Vice Chair
Janis Flauding
Minh-Anh Hodge
Derek Young

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: Document No. FR-516-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 Tacoma Housing Authority (THA), I write to convey the agency's feedback concerning the proposed revisions to Form 50900. While THA fully supports the appropriate planning for and reporting of Moving to Work (MTW) activities, THA recognizes room for improvement in the process outlined in the current Form 50900 and in its revised format for doing so. The current collection of information is not necessary for the proper performance of the functions of the agency. The estimate of the agency's time burden to complete the collection of information is grossly underestimated. There are many ways to enhance the quality, utility, and clarity of the information collected as well as ways to minimize the burden of the collection of information.

Minor revisions to Form 50900 do not address the breadth of concerns previously identified by MTW agencies when the current version was finalized and implemented. Additionally, revisions to Form 50900 were intended to be settled collaboratively between MTW Agencies and the Department of Housing and Urban Development's (HUD) MTW Office during recent contract negotiations. Finalizing the proposed form in its current state has the potential to leave in place for up to three years a form that does not begin to address the four areas for which you seek public comment. For the purposes of this public feedback process, THA has separated its comments into three segments: 1) fundamental issues with Form 50900, 2) issues with the *revisions* to form 50900 and 3) responses to HUD solicitation of comments.

Fundamental Issues with Form 50900

Many of the “fundamental issues” defined below also fall under multiple categories of which HUD solicits public comment. THA has identified the following concerns with the existing Form 50900:

- 1) The methodology for Households Served needs more flexibility to reflect MTW activities that aim to serve more unique households for a shorter period of time. For example, THA serves households through a local non-traditional activity that provides short term rental assistance to homeless families and youth. THA serves more households through this activity than the amount reflected through the methodology which requires the agency to divide the total number of households served by 12 to show the unit month average. This causes confusion in understanding the impact of the program and the total number of households that actually received assistance.
- 2) HUD Standard Metrics lack integrity and aggregating across agencies is problematic per the following reasons:
 - a. Metrics that are irrelevant to an MTW activity have been imposed. In many cases these metrics have little to no connection to the activity itself and/or may be impossible to measure within the context of the activity. Example: Activities under the Cost Effectiveness objective are required to include CE #3: Decrease in Error Rate of Task Execution even if the PHA has a low error rate or the activity will not actually change the task being done.
 - b. Some metrics require agencies to populate numbers that cannot be verified. Example: Number of households moved to a better neighborhood or unit.
 - c. Baseline values may be arbitrary. In many cases, they were set retroactively for existing activities.
 - d. Costs are not calibrated to account for different markets (Example: staffing costs and HAP vary).
 - e. Benchmark and outcome values are arbitrary as there is no agreed upon formula for determining these.
 - f. Benchmarks are set on an annual basis. This does not allow a view of comparisons over time, meaning that long term impacts are not measured.
 - g. Initial year outcomes can vary dramatically from subsequent years. Successful outcomes in subsequent years may be a flat line. If you do not understand the activity, flat line outcome data may be misleading and misinterpreted.
 - h. Average and median outcomes should be considered. Currently, the metrics only capture average data. Focus on averages is insufficient in showing actual impact as they do not calibrate for different markets. Example: 15 families moving to self-sufficiency in a small agency has a larger impact than in a large agency.

- 3) HUD recognizes that an activity may be advancing one MTW goal while working against another (e.g. a self-sufficiency activity may require more services and greater administrative burden). This should be factored in the design of the metrics.

Issues with the revisions to Form 50900

THA has identified the following concerns with the revisions to Form 50900:

- 1) 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.) whereas before these were considered MTW activities to lessen administrative burden.
- 2) The schedule and components of the impact analysis are not clear.
- 3) The revised form states that metrics will be required as assigned by HUD. HUD's standard metrics and the process for assigning them to MTW activities do not always align with the intent of the activity. The effort to determine the appropriate metrics should continue to be collaborative. If the agency is required to report on all metrics assigned by HUD, the time required to complete Plans and Reports should be increased above the already burdensome level.
- 4) The revised form requires increased reporting on the use of Single Fund Flexibility. Requiring agencies to report cost implication of specific MTW activities as well as how that surplus or deficit will be managed impedes the agency's ability to exercise the fundamental flexibility of MTW participation, to combine operating, capital and voucher funds into a single block grant. Additionally, requiring this will greatly increase the staff time necessary to complete the collection of information through Form 50900.
- 5) Closing out activities requires agencies to close them out in the report and to place them in the "not yet implemented" section of the plan if the activity will not be active during the plan year. This does not seem to be an appropriate category for closed out activities.

Response to HUD's solicitation of public comment:

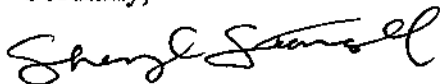
As noted above, much of THA's feedback may fall into one or more of the public comment areas below. THA has identified suggestions for each of the areas on which this public process seeks to gain feedback. They are formatted by public comment area as follows:

- 1) Whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information will have practical utility;
 - a. Many agencies work with third party data depending on the nature of the activity; changes to data requirements cause continual needs to have these third parties change the way they are collecting data.
- 2) The accuracy of the agency's estimate of the burden of the proposed collection of information;
 - a. Frequent changes to the form and its associated pieces/metrics and reporting requirements have cost and time implications.

- b. The estimated time of 81 hours to complete the information collection required by Form 50900 is insufficient.
- 3) Ways to enhance the quality, utility, and clarity of the information to be collected; and
- a. Use of the HAI Portal developed by MTW agencies to better collect MTW information;
 - b. tracking changes over time;
 - c. more meaningful benchmark methodology;
 - d. incorporate the Substantially the Same calculation into the Report; and
 - e. account for real time development and disposition.
- 4) Ways to minimize the burden of the collection of information on those who are to respond; including through the use of appropriate automated collection techniques or other forms of information technology, e.g., permitting electronic submission of responses.
- a. Use of the HAI Portal developed by MTW agencies to better collect MTW information;
 - b. streamline the metrics, pare them down;
 - c. tie the data collection and the metrics to the three statutes of the contract; and
 - d. align the metric data to 50058 data in order to ease the data collection process. This information is already being gathered and reported. This would also help ensure that the data being collected is accurate and matches 50058 data.

THA thanks you and the Department for the opportunity to comment and looks forward to the opportunity to discuss working towards a meaningful collection of information to best plan for and report on MTW activities.

Cordially,



Sheryl Stansell
Planning and Policy Analyst
Tacoma Housing Authority