



Cambridge Housing Authority

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PIH

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:

Cambridge Housing Authority (CHA) submitted our FY15 Plan and Report, FY16 Plan, and FY17 Plan in the current Form 50900 format. At present, we are preparing our FY16 Report in the same format. As one of the first MTW agencies formed under the Moving to Work demonstration, we have complied with and submitted to HUD all iterations of Attachment B and Form 50900. We submit the following comments as noticed in Document No. FR-5916-N-02.

CHA understands and agrees that the flexibility permitted under MTW should be evaluated in a meaningful manner that allows comparisons not only between MTW agencies but also non-MTW agencies. While the current Form 50900 attempts to incorporate metrics intended to measure MTW's three (3) core goals, its emphasis on aggregating outcomes that is inclusive of as many MTW activities as possible, has in fact, distorted the data on MTW activities. We fear aggregation of HUD's metrics across all MTW agencies will create an inaccurate and misinformed perspective of MTW.

When the current Form 50900 was first implemented in our FY15 Plan, we were in numerous conversations with the HUD MTW office on determining appropriate metrics for our MTW activities. The process was involved and required three rounds of responses between CHA and HUD. In the end, we conformed but were incredibly disheartened by the forceful prescription of metrics.

In the past year, we actively participated in the MTW extension negotiation and we shared the executive committee's concern with the process of re-designing and developing of a new Attachment B of the MTW Agreement, as the current form contains metrics that would not pass muster in any evaluation with integrity. This, I believe, is a sentiment collectively shared by the MTW community as well as subject matter experts in program assessment and evaluation.

Needless to say, we were incredibly dismayed when this notice was released and the general form and substance of the current Form 50900 is being presented for a 60-day comment period. To extend this form, with some modifications and clarification, an additional three (3) years would provide the MTW office with six (6) years of distorted aggregate metrics to represent MTW activities. We find this prospect to be incredibly distressing, particularly at a time when the political climate values thoughtful evaluation and evidence-based policy-making.

In addition to submitting our comments, we fully support the comments submitted by the MTW Steering Committee. The following are additional concerns with specific items in the Form 50900.

## **MODIFICATION IN DEFINITIONS AND NEW LOBBYING DISCLOSURE REQUIREMENT CONFLICT WITH MTW AGREEMENT**

We are concerned that the new form explicitly states that “Households Receiving Services Only” will not be included in determining substantially the same (StS) (p3). At this time, there is no agreed-upon definition or formula for StS and we believe excluding “households receiving services only” already draws an StS boundary.

In addition, Rent Reform has been conditioned to be any change in rent calculations or cycles that a non-MTW agency cannot implement. We believe this imposes additional burden, as any rent reform activity automatically triggers formation of a hardship policy and impact analysis that may not be needed.

The new form states, “HUD will determine the Standard HUD Metrics that the MTW PHA must provide....” (p4). This language denotes that HUD is the final authority on data points and that the PHA must comply accordingly. We could not find language in our MTW agreement to support this arrangement.

A Lobbying disclosure has been proposed as a new requirement in the 50900. We believe this to be beyond the scope of the MTW Agreement.

## **APPROACH TO METRICS IS PROBLEMATIC**

As stated earlier, we find HUD Standard Metrics to be multi-dimensionally problematic. The bullet points below reiterate the arguments that we expressed to HUD during our FY15 Plan review. We believe the issues still resonate with the revised Form 50900.

- Metrics that are irrelevant to an MTW activity have been imposed.
- HUD’s current metrics force PHAs to populate numbers that cannot be verified. Example: Our Sponsor-based Voucher Program was designed as a transitional housing program with no anticipation with respect to self-sufficiency only that the family would be stabilized and perhaps later on move toward self-sufficiency. Our database was never set up to track self-sufficiency because that is not the goal of the activity. HUD’s insistence on populating this metric, and attaching a definitive level of self-sufficiency (End of Subsidy), forces us to report on an outcome that we cannot validate and never intended as a goal of the activity.
- Baseline may be arbitrary and/or not meaningful with a 0 value.
- Costs are not calibrated to account for different markets (e.g. staffing costs and HAP vary)
- Benchmarks are set on an annual basis and can change each year. How is this factored over time?
- 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.
- Average and median outcomes need to be considered.
- Definition of self-sufficiency is different in different markets and should allow more than one standard definition. For example, a "reduction in subsidy" is a more accurate definition in expensive housing markets and should be considered, particularly if a household experiences repeated reductions during over time.
- 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.

We believe it is necessary to completely revamp the current Form 50900 in order to properly and fairly assess the MTW program and activities. At the 2016 MTW Conference, we were pleased to get a preview of the MTW evaluation methodology that the Urban Institute has developed under HUD. We think it is possible to develop a thoughtful assessment tool and set of metrics that MTW agencies could submit on an annual basis. The recent effort put forth by the HAI Group and Abt Associates in developing an MTW Performance Report, combined with proposed MTW performance indicators exemplifies a possible model or path to gather meaningful data. In addition, the groundwork for the HAI portal was developed by MTW staff, people who are in the weeds of operating an MTW agency. We think these two tools (the performance indicators and portal) are already a vast improvement in identifying valuable data points to assess MTW agencies than the current and revised Form 50900.

At the 2016 MTW Conference, HUD staff clearly expressed a positive energy about the MTW Extension and value of MTW, particularly in light of the legislation to open the MTW community to 100 additional high-performing PHAs. Knowing that this new wave is in the pipeline, we think it fitting and urge HUD to overhaul the current 50900. One of the benefits of being an MTW agency has been the ability to establish or build a robust policy team. MTW agencies, like ours, are ready and eager to work with HUD on this effort and can draw directly from the lessons learned in the current Form 50900.

Thank you for your consideration and this opportunity to comment on the Revised Form 50900.

Sincerely,



Greg Russ  
Executive Director

cc: Sunia Zatterman, CLPHA  
Tim Kaiser, PHADA