



CITY OF OCEANSIDE

MARGERY M. PIERCE
DIRECTOR

NEIGHBORHOOD
SERVICES DEPARTMENT

November 9, 2015

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

SUBJECT: Comments: Core Performance Reporting Requirements for Competitively-Funded Grants

Dear Ms. Pollard:

The City of Oceanside Community Development Commission (CDC), CA132, respectfully submits the following comments related to the Core Performance Reporting Requirements published in the Federal Register on September 10, 2015. The CDC administers a voluntary Family Self Sufficiency (FSS) program with a maximum of 50 participants and receives funding for one FSS Coordinator. Fifty-one percent of FSS programs nationwide only employ one coordinator. All comments apply to the FSS program.

The CDC is very concerned about the additional amount of data collection that is being proposed, due to the statement that entities are expected to implement the proposed recordkeeping and reporting requirements with available grant funds. The current FSS Coordinator funding has been inadequate for many years and only covers about two-thirds of the cost of the CDC's FSS Coordinator. The CDC previously was funded for two FSS Coordinators and enrolled 100 HCV participants in FSS. As a result of funding cuts and the low amount of the FSS Coordinator grant, the CDC decided to continue the program with one coordinator several years ago. The maximum funding for the FSS Coordinator grant is the same nationwide, which is a distinct disadvantage in higher cost areas, such as Oceanside.

While the CDC understands the need for reporting measurable outcomes, the proposed data collection will be very burdensome for many public housing authorities. The result will be more time spent on documentation and less time assisting participants to become self sufficient, develop resources and work with the Program Coordinating Committee. Additional specific comments follow:

- Chart F: Seven of the 13 items required for the FSS program are data that is not currently collected and no database exists to collect the data. For example, number 18." Percentage of income spent on housing and transportation." This information is not calculated or collected by the CDC; our software does not do it, even though we have purchased the Designing Success FSS software. The result would be additional Coordinator time and additional money for tools to arrive at the data, without additional funding. Participants have a choice where they live and can choose to stay in a unit where they are paying more than 30-40% of their income for housing and utilities. To use this as a measure of the program's performance seems imbalanced. The CDC cannot require that the participant reduce the percentage of income they spend on housing and utilities. A second example is "transportation". Chart B describes that as "monthly transportation costs including car payment, vehicle insurance and public transportation cost", while excluding gas. The CDC has no control over how much a participant chooses to pay for a vehicle. The CDC would be held accountable for the tenant's decision related to their vehicle.
- Chart B proposes that this information be collected for each individual participant while the present e-logic model requires this information to be reported collectively. Fifteen of the seventy-three items proposed for the Participant Level information (related to the FSS Program) are collected in the present PHA software. The other fifty-eight items are not. For example, "Years in Subsidized housing." Considering that an individual can port their voucher and may have been in other forms of subsidized housing before reaching the present housing authority, this question (for each participant) could require significant research time on the part of the reporter.
- The field office always requests the annual report earlier than is required by HUD (end of January), thus FSS staff must complete the finished report in just a few weeks. If additional data is requested, it will be necessary to start working on the report in December to complete it in time. It is suggested that housing authorities be given 60 days after the program year is finished to submit the annual report, particularly if additional data is required.
- Many FSS Coordinators do not have the recommended caseload of 50 participants, with some assisting as many as 250 participants. In addition, many FSS Coordinators perform the occupancy function for their caseloads and handle other programs primarily due to the low amount of the grant funding for FSS Coordinators; the grant has been stagnant for many years. In high cost areas, the amount is not adequate to pay the cost of a coordinator.

In summary, The CDC is a strong believer in the FSS program and is proud of the number of successful outcomes achieved; however, HUD seems to be increasing disincentives to offer the program to HCV participants, including the lack of funding and now the proposal to require additional data collection without additional funding.

If you have any questions or would like additional information, please contact Angie Hanifin, Housing Program Manager at 760-435-3363 or via e-mail at ahanifin@ci.oceanside.ca.us.

Sincerely,

A handwritten signature in black ink that reads "Margery M. Pierce". The signature is written in a cursive style with a large, looping "M" and a trailing flourish.

Margery M. Pierce
Neighborhood Services Director