

Pollard, Colette

From: Michele Wiggins <mwiggins@hacg.org>
Sent: Wednesday, May 18, 2016 10:27 AM
To: mtw-info
Cc: Pollard, Colette
Subject: Docket No. FR-5932-N-01, Public Comments from HACG regarding MTW
Attachments: HACG, Public Comments MTW.pdf

To Whom It May Concern:

In response to **Docket No. FR-5932-N-01: Request for Specific Policy Proposals and Methods of Research and Evaluation for MTW Demonstration Expansion**, we would like to submit the attached comments. Please see our CEO, Anthony Goodson, Jr.'s, letter regarding HUD's request for data regarding MTW policies and evaluations.

We appreciate your review and consideration.

Michele Wiggins
Director of Grant Management
Housing Authority of the City of Goldsboro
700 N. Jefferson Ave.
Goldsboro, NC 27533-1403
P: 919-735-4226 ext. 117
F: 919-731-4402

HOUSING AUTHORITY OF THE CITY OF GOLDSBORO, NC

P O BOX 1403 · GOLDSBORO, NORTH CAROLINA 27533-1403
(919) 735-4226 · FAX (919) 731-4402
TTY (919) 587-9507 EXT. 162

COMMISSIONERS:

GOLDIE H. SMITH, CHAIR
RICHARD DURHAM, VICE CHAIR
JANICE L. HAM
I.K. WILLIAMSON
WILLIAM TURNER
JEAN WHITFIELD
EARL MURPHY

MAYOR CHUCK ALLEN, EX-OFFICIO

ANTHONY GOODSON, JR., CHIEF EXECUTIVE OFFICER

PHILIP A. BADDOUR, JR., ATTORNEY

May 17, 2016

Office of Public and Indian Housing
Department of Housing and Urban Development
451 7th Street SW
Washington, DC 20410-0001

Re: Docket No. FR-5932-N-01: Request for Specific Policy Proposals and Methods of Research and Evaluation for MTW Demonstration Expansion

To Whom It May Concern:

We would like to thank HUD for the recent expansion of the Moving-to-Work (MTW) program and the opportunity to comment on future developments and structure. As a high-performing agency, we are always looking for ways to improve our programs and services, and we believe MTW provides an excellent vehicle to do so.

While we are not currently a MTW agency, our research and experiences with other MTW agencies indicate that much of the success of these efforts is focused on flexibility for local discretion to implement local strategies devised for the climate surrounding specific agencies and their partners. PHA flexibility and fungibility have allowed incredible innovations around the country. We encourage HUD not to hinder MTW capabilities to achieve and innovate by placing overbroad restrictions on MTW programs.

In regard to the request for comments, we offer the following insights:

A. Specific Policy Proposal Recommendations

- Increasing moves of low-income families to high-opportunity neighborhoods

HACG strongly believes in decreasing the concentration of poverty and moving public housing residents and low-income families out of desolate pockets of poverty into high-opportunity neighborhoods in less remote areas with locations close to shops, services, and employment opportunities. Increasing access to additional vouchers and programs such as LIHTC (Low-income housing tax credits) provides resources to make this more of a possibility for low-income families. Allowing PHAs the flexibility to purchase land, acquire existing properties, and engage in new construction in a timely manner will also aid in these efforts to provide affordable housing in high-opportunity neighborhoods.

- Using administrative flexibilities to reduce costs and improve operations, governance, and financial management

Flexibility is a major advantage of MTW. Giving programs the authority to save time and costs by streamlining their processes through local initiatives is a strong indicator of success and sensibility. Unfortunately, sometimes administrative burdens and legislative policies detract from their intended purpose. Rigid adherence to antiquated models has forced PHAs to decline beneficial opportunities in the face of receiving lower scores and potential reprimands. If PHAs are focused on the core goals of MTW (cost-effectiveness, self-sufficiency, and housing choice options) with good internal oversight, agency discretion should be utilized to get things done.

Some examples of strategies from other agencies that would be effective in reducing costs and administrative burden include minimizing interim readjustments, eliminating verification of 100% excluded income, standard utility allowances, and other such policies that are feasible and responsible but also allow for simplification of administrative procedures. Please see other sections for additional applicable examples.

- Structuring alternative rent-setting methods

Alternative rent-setting methods can provide a focus on gradual increases to assist residents with self-sufficiency where increased income is a possibility. Protecting low-income families while still working to prepare them for the private market can be better achieved through such programs as tiered rent, correlations between unit sizes and rent rates, minimum earned income, or increased minimum rent policies.

Coupling such policies with education, self-sufficiency programs, and supportive services provides the opportunity for increased success for residents. It would also benefit PHAs by decreasing waiting lists as more individuals transition out of housing and providing income that could be used for capital improvements or special projects with the appropriate permissions.

- Streamlining admissions and/or occupancy policies (*i.e.*, work requirements, time limits, waitlist preference alterations)

Work requirements for workable adults would be a benefit for MTW agencies and other PHAs. Such requirements provide a less abrupt alternative to imposing time limits on residents while still providing incentive to increase upward mobility and focus on the transitional nature of housing and highlighting the importance of self-sufficiency. Innovative solutions may include tiered housing programs that allow apartment upgrades for able residents that are willing to work. Allowing preferences for work willingness in collaboration with other programs such as FSS, ROSS, and Jobs Plus could also be beneficial. A cohort for Jobs Plus recipients or agencies willing to adopt work requirements is highly recommended.

Using alternate definitions for terms such as elderly and homeless could also benefit applicants and residents. Some programs designate anyone age 55 and older as elderly. This could make other services more available to them due to their designation and prevent unnecessary moves for individuals that are potentially less mobile and less likely to transition in some cases. HUD's definition of homelessness has also created difficulty in reporting and assessment for point-in-time counts due to collaboration with other agencies that have a more inclusive definition. Additionally, many individuals are in crisis and desperately need homes but cannot be counted toward assessing the need for VASH or other PBVs due to statutory restrictions.

- Improving the health and wellbeing of elderly and disabled residents

Elderly and disabled residents are some of our most vulnerable populations. Methods such as lifting or

increasing the cap on project-based vouchers, inclusion or community service programs such as connected living; reduced recertification frequency, and increasing supportive services could benefit residents in these categories.

Providing creative partner collaborations and programs also decreases potential problems and administrative burden for individuals needing more assistance and allows individuals to maintain their own independent living for longer.

B. Research and Evaluation Proposal Recommendations

Gauging success is important; however, attempts to streamline program innovations may result in a destruction of the program's validity. Success measures should not always be numerical, and qualitative data should be used in conjunction with quantitative data to capture the totality of outcomes and change over time.

The suggestions provided above are not all-inclusive, but provide an indication of the types of programs that have been successful or show promise of being successful. Providing quality services to residents while allowing PHAs the latitude necessary to get things done provides appeal for MTW, and it is why we as an agency would be interested in gaining the designation. We appreciate HUD's willingness to consider the administrative burdens and barriers to success for MTW. We hope that the creation of cohorts will not minimize other strategies by trying to create a one variable solution to a multiple variable problem. We look forward to continued innovations in the future.

Respectfully,



Anthony Goodson, Jr.
Chief Executive Officer

Community	Community Map Repository Address
Madison County, Iowa and Incorporated Areas	
Maps Available for Inspection Online at: http://www.fema.gov/preliminaryfloodhazarddata	
Project: 15-07-0897S Preliminary Date: May 18, 2015	
City of Earlham	City Hall, 140 South Chestnut Avenue, Earlham, IA 50072.
City of East Peru	Community Building, 120 Brown Street, East Peru, IA 50222.
City of Patterson	Patterson City Clerk's Office, 1730 110th Avenue, Murray, IA 50174.
City of St. Charles	City Hall, 113 South Lumber Street, St. Charles, IA 50240.
City of Truro	City Hall, 120 East Center Street, Truro, IA 50257.
City of Winterset	City Hall, 124 West Court Avenue, Winterset, IA 50273.
Unincorporated Areas of Madison County	Madison County Courthouse, 112 North John Wayne Drive, Winterset, IA 50273.
Sandusky County, Ohio and Incorporated Areas	
Maps Available for Inspection Online at: http://www.fema.gov/preliminaryfloodhazarddata	
Project: 11-05-5340S Preliminary Dates: July 17, 2015 and December 9, 2015	
City of Fremont	323 South Front Street, Fremont, OH 43420.
Unincorporated Areas of Sandusky County	108 South Park Avenue, Fremont, OH 43420.

[FR Doc. 2016-07495 Filed 4-1-16; 8:45 am]

BILLING CODE 9110-12-P

DEPARTMENT OF HOMELAND SECURITY

Federal Emergency Management Agency

[Internal Agency Docket No. FEMA-4268-DR; Docket ID FEMA-2016-0001]

Mississippi; Major Disaster and Related Determinations

AGENCY: Federal Emergency Management Agency, DHS.

ACTION: Notice.

SUMMARY: This is a notice of the Presidential declaration of a major disaster for the State of Mississippi (FEMA-4268-DR), dated March 25, 2016, and related determinations.

DATES: Effective Date: March 25, 2016.

FOR FURTHER INFORMATION CONTACT: Dean Webster, Office of Response and Recovery, Federal Emergency Management Agency, 500 C Street SW., Washington, DC 20472, (202) 646-2833.

SUPPLEMENTARY INFORMATION: Notice is hereby given that, in a letter dated March 25, 2016, the President issued a major disaster declaration under the authority of the Robert T. Stafford Disaster Relief and Emergency Assistance Act, 42 U.S.C. 5121 *et seq.* (the "Stafford Act"), as follows:

I have determined that the damage in certain areas of the State of Mississippi resulting from severe storms and flooding beginning on March 9, 2016, and continuing, is of sufficient severity and magnitude to warrant a major disaster declaration under

the Robert T. Stafford Disaster Relief and Emergency Assistance Act, 42 U.S.C. 5121 *et seq.* (the "Stafford Act"). Therefore, I declare that such a major disaster exists in the State of Mississippi.

In order to provide Federal assistance, you are hereby authorized to allocate from funds available for these purposes such amounts as you find necessary for Federal disaster assistance and administrative expenses.

You are authorized to provide Individual Assistance in the designated areas and Hazard Mitigation throughout the State. Consistent with the requirement that Federal assistance be supplemental, any Federal funds provided under the Stafford Act for Hazard Mitigation and Other Needs Assistance will be limited to 75 percent of the total eligible costs.

Further, you are authorized to make changes to this declaration for the approved assistance to the extent allowable under the Stafford Act.

The time period prescribed for the implementation of section 310(a), Priority to Certain Applications for Public Facility and Public Housing Assistance, 42 U.S.C. 5153, shall be for a period not to exceed six months after the date of this declaration.

The Federal Emergency Management Agency (FEMA) hereby gives notice that pursuant to the authority vested in the Administrator, under Executive Order 12148, as amended, Lai Sun Yee, of FEMA is appointed to act as the Federal Coordinating Officer for this major disaster.

The following areas of the State of Mississippi have been designated as adversely affected by this major disaster:

Bolivar, Coahoma, and Washington Counties for Individual Assistance.

All areas within the State of Mississippi are eligible for assistance under the Hazard Mitigation Grant Program.

The following Catalog of Federal Domestic Assistance Numbers (CFDA) are to be used for reporting and drawing funds: 97.030, Community Disaster Loans; 97.031, Cora Brown Fund; 97.032, Crisis Counseling; 97.033, Disaster Legal Services; 97.034, Disaster Unemployment Assistance (DUA); 97.046, Fire Management Assistance Grant; 97.048, Disaster Housing Assistance to Individuals and Households In Presidentially Declared Disaster Areas; 97.049, Presidentially Declared Disaster Assistance—Disaster Housing Operations for Individuals and Households; 97.050, Presidentially Declared Disaster Assistance to Individuals and Households—Other Needs; 97.036, Disaster Grants—Public Assistance (Presidentially Declared Disasters); 97.039, Hazard Mitigation Grant.

W. Craig Fugate,

Administrator, Federal Emergency Management Agency.

[FR Doc. 2016-07507 Filed 4-1-16; 8:45 am]

BILLING CODE 9111-23-P

DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

[Docket No. FR-5932-N-01]

Request for Specific Policy Proposals and Methods of Research and Evaluation for MTW Demonstration Expansion

AGENCY: Office of the Assistant Secretary for Public and Indian Housing, and Office of the Assistant Secretary for Policy Development and Research, HUD.

ACTION: Notice.

SUMMARY: This notice is to solicit recommendations for specific policy proposals and methods of research and

evaluation to be implemented as part of the expansion of the Moving to Work (MTW) demonstration program. The 2016 Consolidated Appropriations Act (the Act) authorizes HUD to expand the MTW demonstration program by an additional 100 high performing Public Housing Agencies over a period of seven years.¹ Agencies will be added to the MTW demonstration by cohort and the Act requires that for each cohort of agencies "the Secretary shall direct one specific policy change to be implemented by the agencies." Having an entire cohort adopt a specific policy will facilitate the evaluation of that policy.

DATES: *Comments Due Date:* May 4, 2016.

ADDRESSES: Interested persons are invited to submit comments regarding specific policy and evaluation proposals to the Moving to Work Office, Office of Public and Indian Housing, Department of Housing and Urban Development, 451 Seventh Street, SW., Room 4130, Washington, DC 20410-0001 or email at mtw-info@hud.gov. HUD strongly encourages commenters to submit comments electronically. Communications must refer to the above docket number and title and should contain the information specified in the "Request for Public Comments" section.

No Facsimile Comments. Facsimile (FAX) comments are not acceptable.

Public Inspection of Public Comments. A summary of all comments received by HUD will be made available on HUD's Web site at: <http://www.hud.gov/mtw>.

FOR FURTHER INFORMATION CONTACT: Questions concerning this notice should be directed to the Moving to Work Office, Office of Public and Indian Housing, Department of Housing and Urban Development at mtw-info@hud.gov.

SUPPLEMENTARY INFORMATION:

I. Background

The statutory purpose² of the MTW demonstration is to give agencies and HUD the flexibility to design and test various approaches for providing and administering housing assistance that:

- (1) reduce cost and achieve greater cost effectiveness in federal expenditures;
- (2) give incentives to families with children where the head of household is working; is seeking work; or is preparing for work by participating in

job training, educational programs, or programs that assist people to obtain employment and become economically self-sufficient; and

- (3) increase housing choices for eligible low-income families.

Agencies will be added to the MTW demonstration by cohort and per the Act: "the Secretary shall direct one specific policy change to be implemented by the agencies, and with the approval of the Secretary, such agencies may implement additional policy changes."

As part of the process to expand the MTW demonstration, the Act states that "[t]he Secretary shall establish a research advisory committee which shall advise the Secretary with respect to specific policy proposals and methods of research and evaluation for the demonstration." Through this Notice, HUD is requesting specific policy proposal recommendations, and methods for research and evaluation recommendations, that will inform the advisory committee in making its own recommendations to the Secretary.

With the expansion of the MTW demonstration, HUD aims to learn from MTW interventions in order to improve the delivery of federally assisted housing and promote self-sufficiency for low-income families across the country.

II. Request for Public Comments

HUD seeks public comments on specific policy proposal recommendations, and research and evaluation proposal recommendations, as described in sections II.A and II.B below. Public housing agencies, HUD-assisted housing residents, researchers, and HUD stakeholders are encouraged to submit comments.

A. Specific Policy Proposal Recommendations

HUD seeks specific policy proposal recommendations related to the three MTW demonstration statutory objectives of cost effectiveness, self-sufficiency, and housing choice. For example, HUD is interested in specific policy areas such as:

- Increasing moves of low-income families to high-opportunity neighborhoods;
- Improving education outcomes through housing partnerships;
- Using administrative flexibilities to reduce costs and improve operations, governance, and financial management;
- Structuring alternative rent-setting methods;
- Streamlining admissions and/or occupancy policies (*i.e.*, work requirements, time limits, waitlist preference alterations);

- Developing strategies to better utilize project-based vouchers;
- Improving the health and well-being of elderly and disabled residents;
- Achieving the goal of ending homelessness for families, veterans, youth, and the chronically homeless; and
- Cultivating supportive or sponsor-based housing policies.

B. Research and Evaluation Proposal Recommendations

HUD also seeks recommendations for research and evaluation methods to be utilized in association with specific policy proposals that will be implemented by MTW agencies in the expanded MTW demonstration. The Act specifically requires that rigorous research methods be used to test the policy proposals. HUD seeks specific proposals of what the committee should consider as rigorous research in addition to randomized control trials. In addition, the law calls for the advisory committee to recommend what policies already are proven effective and could be implemented without further research. HUD seeks comment on what policies should be considered as having already been proven successful, with specific reference to the rigorous research that supports the claim.

Dated: March 28, 2016.

Lourdes Castro Ramírez,
Principal Deputy Assistant Secretary for Public and Indian Housing.

Katherine M. O'Regan,
Assistant Secretary for Policy Development and Research.

[FR Doc. 2016-07663 Filed 4-1-16; 8:45 am]

BILLING CODE 4210-67-P

DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

[Docket No. FR-5916-N-05]

60-Day Notice of Proposed Information Collection: Energy and Performance Information Center (EPIC)

AGENCY: Office of the Assistant Secretary for Public and Indian Housing, HUD.

ACTION: Notice.

SUMMARY: HUD is seeking approval from the Office of Management and Budget (OMB) for the information collection described below. In accordance with the Paperwork Reduction Act, HUD is requesting comment from all interested parties on the proposed collection of information. The purpose of this notice is to allow for 60 days of public comment.

¹ Pub. Law 114-113, Sec. 239.

² Congress originally authorized the MTW demonstration in 1996 (Pub. Law 104-134; 42 U.S.C. 1437f note).