

HUD FORM 50900: PRA Comments and Responses

#	Issue Raised by Commenters	Response
1	Form 50900 would benefit from a major overhaul, as opposed to minor revisions. HUD should use this opportunity to build on the work being done by Abt Associates and the HAI Group.	HUD is aware of the work being done by Abt and HAI. HUD also has its own contractor in place to develop a performance metric system for the Demonstration. At this time, none of that work is complete and HUD believes it would be presumptive to overhaul Form 50900 at this time. In the interim, HUD needs data included on the current form to enable program-wide reporting and to meet obligations to the GAO and HUD's OIG.
2	The estimate of burden hours associated with Form 50900 is not high enough and should be raised.	HUD believes if a PHA is completing purely the required information on the Form that on average 80 hours is adequate. While past significant revisions to the Form have created additional work for PHAs as they have transitioned to revised format, these 2016 revisions to the Form are not significant and should not create an increased temporary, or permanent, reporting burden for MTW PHAs. HUD does understand that many MTW Agencies use the Annual MTW Plan and Annual MTW Report as more than a reporting tool to HUD. In many communities, these documents provide broader and more detailed information than is required in the Form, in order to communicate with local stakeholders regarding the overall programs and operations of the PHA. However, this is not required and is done at the discretion of each PHA.
3	Standard HUD Metrics should be overhauled to collect more useful data. Further, HUD has added text to give it sole decision-making authority about which metrics are applicable; this should be done through a collaborative process with PHAs.	Again, HUD is aware of the work being done by various parties to develop performance measures for the Demonstration. Given none of that work is complete, HUD believes it would be presumptive to overhaul any aspect of Form 50900 at this time. In the interim, HUD needs the data included on the current form to enable program-wide reporting and to meet obligations to the GAO and HUD's OIG. Regarding the applicability of standard metrics, the previous version of this Form already enabled HUD to make the final decision, but given some PHAs argued about this point, HUD has made that more explicit in this revised version of the Form. Standard metrics only work when they are implemented in a standardized way across similar activities, thus HUD needs to have the ability to ensure that standardized implementation occurs.

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4	HUD has expanded the description of the single-fund budget in Section V to require additional burdensome detail.	HUD has expanded this description to clarify what information is expected from PHAs. The prior description was not explicit, and as a result, some PHAs were providing minimal information in this section of the Plan/Report. Information on how PHAs are using the single-fund is critical to enable HUD to report to Congress and other stakeholders on the results of the block grant funding approach.
5	Why is HUD collecting information on the Substantially the Same (STS) Requirement when revisions to the methodology are not yet final? HUD should include a section for PHAs to report households receiving services-only.	While HUD and MTW PHAs have discussed a new methodology for monitoring the MTW statutory requirement to serve substantially the same (STS) number of families, no new methodology has been enacted. Thus, HUD continues to use the methodology contained in PIH Notice 2013-02 which relies on counts of local, non-traditional families from Form 50900 because that information is not contained in HUD's systems. This revised Form 50900 continues to include a section for MTW PHAs to report on families served only through services, but per PIH Notice 2013-02, these families do not count towards meeting the STS requirement.
6	HUD should include information on STS compliance in the Annual MTW Plan/Report.	Because this is a program monitoring function, not a reporting requirement, the outcome of HUD's review is not appropriate for inclusion in the Annual MTW Report.
7	HUD does not need to collect lobbying forms in the MTW Plan; this is duplicative to the Form's certifications of compliance.	HUD has revised Form 50900 to collect these forms with the Annual MTW Plan to address a recommendation by HUD's OIG. Including this information with the MTW Plan makes this information easily accessible to interested parties.
8	In the Report, Section II, HUD only allows agencies to explain comparable mix variances up to 5%; this threshold is inadequate.	The final version of this Form allows agencies to explain variances over 5%.
9	In the Report, Section II, HUD should remove the breakdown of incomes that has been added to the reporting on the 75% VLI requirement.	Given HUD does not receive information about local, non-traditional families served in its system, collecting this information allows HUD to better understand the nature of families served through LNTD programs, as well as ensure compliance with this MTW statutory requirement.
10	In the Report, Section V, HUD removed the table allowing PHAs to list obligations and commitments; this table should be put back into the Form so that PHAs can report plans for their reserve funds.	Given recent changes to VMS and implementation of cash management practices in the HCV program, HUD believes it will now have adequate information regarding the uses of reserve funds.

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19	In Section II, information collected on number of public housing units to be added does not allow for zero-bedroom/studio unit size.	In Section II.A.i in the Annual MTW Plan, the 1-bedroom category was changed to include zero and 1-bedroom units.
20	In Section II, information collected on households in the local, non-traditional categories cannot be easily linked to an MTW activity.	In Section II.B.i, in both the Annual MTW Plan and Annual MTW Report, a detail table was added to track local, non-traditional households planned to be served to the corresponding MTW activity.
21	In Section II, there is no ability to collect information on when/how waiting lists will be opened or closed. This is important information for a public document.	In Section II.C.ii, in both the Annual MTW Plan and Annual MTW Report, clarification was added that the details of the opening and closing of a wait list should be discussed in the narrative “changes to waiting list” section.
22	Standard HUD Metrics under the “Self-Sufficiency” category include “Increases in Agency Rental Revenue” (as SS#7) and the corresponding inverse “Reducing Per Unit Subsidy Costs for Participating Households” (as SS#6). In the “Cost Effectiveness” category, there is an analogous Standard HUD Metric to SS#7, but none for SS#6.	In the Standard HUD Metrics, CE#6 on “Reducing Per Unit Subsidy Costs for Participating Households” was added to the “Cost Effectiveness” category.
23	Overall, no specific information collection on Affirmatively Further Fair Housing (AFFH) obligations in included.	Section I.C was added to capture the same information that all PHAs will likely provide (pending the approval of the revised HUD Form 2577-0226 – the Annual PHA Plan for non-MTW PHAs) on AFFH obligations.
24	Overall, not enough information is collected on participation in the Rental Assistance Demonstration (RAD).	In Section II.A.iii and II.A.iv in the Annual MTW Plan, and the analogous II.A.i and II.A.ii in the Annual MTW Report, a column was added to the table on Project-Based Voucher reporting to indicate whether or not the units are under the RAD program. Also, a section V.C was added to the Annual MTW Plan collecting additional information on participation in RAD.
25	Overall, there is no explicit information on collection of data related to local Energy Performance Contracts (EPCs) conducted with MTW flexibility.	A Section VI.D was added to direct the submission of data on local EPCs conducted with MTW flexibility as detailed in the specific Standard MTW Agreement of the MTW PHA.
26	HUD should take steps to require transparency in all financial reporting by de-regulated PHAs. It is no secret that several MTW PHAs have used single-fund flexibility to divert	Section V of the Annual MTW Plan and Annual MTW Report is dedicated to providing information on financial reporting. It is important that the information be in the same format as other required

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	significant resources into cash reserves or excessive executive compensation. Suggestions include: Require a format other than the Financial Data Schedule (FDS); Clarify certain items; Clearly link sources to uses of funds in the Annual MTW Report; and Require MTW PHAs to report on reserves.	HUD financial reporting to eliminate duplicative information submittals.
27	Given that Form 50900 acts as an MTW agency's Annual Plan, it is imperative that HUD require a robust resident participation process. Suggestions include: Include additional reporting requirements and Include resident participant requirements in general instructions.	Section VI.B requests information related to the documentation of public process that is consistent with the Standard MTW Agreements for MTW PHAs.
28	HUD should require agencies to provide the information needed to assess compliance with statutory requirements. HUD should add a required chart to Section II.B. of the MTW Report that would reflect whether the PHA served substantially the same number of families with MTW flexibility.	Because this is a program monitoring function, not a reporting requirement, the outcome of HUD's review is not appropriate for inclusion in the Annual MTW Report.
29	HUD should also revise Section II.D. i. 75% of Families Assisted are Very Low Income to reflect additional data that would help HUD and advocates determine whether the PHA is meeting the "substantially the same" requirement. Regular HUD income levels should be used.	Because this is a program monitoring function, not a reporting requirement, the outcome of HUD's review is not appropriate for inclusion in the Annual MTW Report.
30	HUD should ensure that key data on topics such as incomes of assisted families and sources and uses of funds are available to the public. Additional information should include: Voucher utilization rates; Voucher success rates by month; Average time for a voucher family to lease up; Average cost per voucher; Waiting List Information; Incomes of families assisted; and Section 3.	In this information collection HUD seeks to balance the collection of information with reporting burden to the PHA.

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31	One significant change in the form since the version proposed in August 2016 is the deletion of a requirement for agencies to report the specific strategies and actions they institute to further each of their fair housing goals. We recommend that HUD restore that requirement.	Section I.C was deleted because the current published version of the Annual PHA Plan does not include this information. If the Annual PHA Plan is revised to include this information, this Form 50900 will be revised to be consistent with that change.
32	Provide separate data on families assisted by each local non-traditional program. HUD should add instructions making clear that agencies must report data separately for each local program in both the plan table on page 9 and the report table on page 11.	Instructions addressing this comment were added on pages 9 and 11.
33	State explicitly that port-in vouchers should not be included in reports.	Information was added to the “Section-by-Section Instructions” that the MTW PHA should not include port-in HCVs not paid for by the MTW PHA.
34	Make clear that agencies may not merely estimate the number of families they assist.	The table has been clarified that estimated numbers may be provided by the Annual MTW Plan, but that actual numbers must be provided in the Annual MTW Report.