Frequently Asked Questions about HUD Form 50900:
Elements for the Annual MTW Plan and Annual MTW Report
February 13, 2018

Background

This document contains a listing of questions regarding HUD Form 50900: Elements for the Annual MTW Plan and Annual MTW Report, issued on January 18, 2018 and expiring on January 31, 2021. The contents of this document will be updated periodically, as questions arise that can be addressed by HUD. Additional questions and answers will be added sequentially under the headings for each section of the Form as they become available. The footer will be updated to denote the updated version number and revision date. If you are an MTW Agency utilizing this form for program reporting purposes, please check back frequently for updates.

The full PDF of Form 50900 can be found on the HUD website at: https://www.hud.gov/program_offices/public_indian_housing/programs/ph/mtw/50900.

If you have a question about Form 50900 that is not yet addressed in this document, please direct your question via email to: mtw-info@hud.gov.

Transition to Form 50900 (expiration 01/31/21)

MTW PHAs undertake planning and reporting processes well before MTW Plan/Report due dates. To that end, the following guidelines are in place to ease the transition to this revised version of the Form 50900:
• PHAs will not be required to submit any MTW Plans/Reports due within 120 days of January 18, 2018, in the revised format. During this time, the PHA may elect to submit their MTW Plan/Report in the prior version of the 50900 (expiration date listed as 05/30/16) or in the revised version of the 50900 (expiration date listed as 01/31/21).
• Any MTW Plans/Reports due in more than 120 days from January 18, 2018, will be required to be in the format of the revised version of the 50900 (expiration date listed as 01/31/21).
• From this point forward, regardless of the format in which the PHA submits its MTW Plan/Report, it is not necessary to submit the additional Excel files for Sections II and V.
• If your PHA is has an extenuating circumstance where you believe is not possible to adhere to this transition, please contact your MTW Coordinator.

Additions to FAQ by Version
• Version #1 (01.18.18): N/A
• Version #2 (02.13.18): Added Question and Answer: G(1).

Frequently Asked Questions by Form 50900 Section

A. General Instructions and Section-by-Section Instructions
   HUD has not yet received questions applicable to this section.

B. Section I. Introduction
   HUD has not yet received questions applicable to this section.
C. Section II. General Housing Authority Operating Information

1. New Public Housing Units Added – Regarding the requirement to list the number of units that are accessible and adaptable, what is the definition of adaptable? We are not sure what you are looking for related to this question.

The definitions of “accessible” and “adaptable” are contained in the Uniform Federal Accessibility Standards (UFAS). Generally speaking, accessible units contain all the features required by UFAS to make the unit fully accessible.

An adaptable housing unit is an accessible dwelling unit with adaptable features that will meet the needs of an individual user by adding or adjusting elements. An adaptable unit includes all of the accessibility features required by UFAS. Adaptable housing is a type of accessible housing that does not look different from other housing and that has both adjustable features and fixed accessible features. The adaptable features can be adjusted, added, or removed as needed to suit the occupants whether they are disabled, older, or non-disabled. For example, an adaptable unit has fixed structural features such as wider entryways and doorways, and turning spaces in kitchens and bathrooms for persons using wheelchairs. Adaptable features may include height-adjustable sinks and counters, removable portions of kitchen or bathroom cabinets to provide knee space, and reinforced bathroom walls to support grab bars that may be added when needed.

Note: An adaptable dwelling unit under the Fair Housing Act includes only those features of accessible and adaptable design specified in the Act and HUD’s final regulation implementing the Act (see 24 CFR 100.205).

2. Planned New Public Housing Units – What if we do not yet know the PIC Dev # for the planned new public housing units to be added?

The units listed in this section should be units that the PHA intends to add to its ACC during the fiscal year, thus, in many instances the PHA should be at a stage where it can request a Development Number be assigned by the local HUD field office. If that is not the case, please insert TBD for the Development Number when preparing the Annual MTW Plan. The assigned number should then be included in the Annual MTW Report submission.

3. Planned Public Housing Units to be Removed – Should MTW agencies continue to include units that were previously approved for demolition/disposition in this table? For example, we previously received approval for 200 units in our scattered sites, of which 4 units remain to be disposed. Should we continue to include these 4 units in the table annually until their disposition is complete?

Yes, these units should continue to appear as planned for removal in the applicable table in the Plan until they are actually disposed.

4. Capital Expenditures - Is there a threshold for reporting on planned and actual capital expenditures?

While we understand that HUD may desire information about capital projects that fall below the previous 30% threshold, providing information on every capital project, no matter how small, is an excessive amount of information for the MTW Plan. In addition, the timeline for developing the agency’s budget presents a conflict as our budget for the following year is approved at the same time as the Plan, making it impossible to provide this information in the Plan. It is especially problematic to expect agencies to be able to project this type of information by development before the completion and adoption of the budget. For example, we may be planning capital work on elevators in our senior housing portfolio in 2014, but decisions at the building or development level about which elevators will be renovated first will not yet be known. Would providing this information in the Report, using a common sense threshold for level of expenditure be a more appropriate place to provide this information?

The Form 50900 requests a general description of capital expenditures and as HUD has conveyed previously to the MTW agencies, HUD does not expect agencies to report on every miniscule detail of their capital expenditures. Using the elevator example provided in the question, in the Plan your agency can note it intends to do elevator upgrades in portions of the senior housing portfolio and list all of the
applicable development numbers. In the Report submission, it can be clarified which specific developments received the upgrades.

Regarding the timing of capital fund budgetary information, the MTW Plan is not required to be submitted immediately upon receipt of board approval so if there were changes to the budget based on the Board hearing and approval, those updates could be made to the data in the Plan prior to submission to HUD.

5. **Planned Number of Households Served – Do we need to report on FUP, VASH, or other non-MTW vouchers?**

   No, PHAs are only required to report on MTW Vouchers in this section. In this version of the Form 50900, there continues to be no requirement to report on non-MTW special purpose vouchers in the Annual MTW Plan and Report. Agencies will continue to report on the utilization of these vouchers in VMS and will be held to traditional utilization requirements, the same as for a non-MTW PHA.

6. **Wait List Information – Are we required to report on each waiting list, or the waiting lists for each program?** For example, because we have site-based waiting lists for our public housing properties, we have multiple waiting lists. Would we be required to report on each one of these waiting lists, or on waiting lists for the public housing program as a whole?

   Agencies are only required to report by housing program, not by individual properties in the case of site-based or geographic-based waiting lists. So, in the waiting list table, you could list ‘public housing’ as the waiting list name and ‘site-based’ in the description field. You would then provide a total number of households on the combined waiting list, making your best effort to remove duplicates.

   If a PHA has some site-based waiting lists and a central waiting list for other sites in a given program, the PHA would use the description field to describe that the program was using a combination of waiting list structures.

7. **Wait List Information – If all of our waiting lists continually accept applicants who qualify as terminally ill (even when the waiting list is closed), does this mean we should say that all of our waiting lists are partially open?**

   Yes, all of your waiting lists would be partially open and should be reported as such.

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**D. Section III. Proposed MTW Activities: HUD Approval Requested**

*HUD has not yet received questions applicable to this section.*

**E. Section IV. Approved MTW Activities: HUD Approval Previously Granted**

1. **Units of Measure – Will HUD accept per unit/per household numbers for costs, savings, and hours for the new standard metrics?** There are a number of MTW activities for which per unit reporting is more appropriate, such as inspections. While we have found MTW inspections strategies to be successful in generating efficiencies, this cannot be accurately captured as a total, because the agency has increased its total number of units.

   When reporting on standard metrics, agencies must use the unit of measure listed for the applicable standard metric in the table in Form 50900. If HUD were to allow agencies to use different units of measure, the data would not be the same across agencies (i.e. standard) and thus the information would not be useful to HUD. If an agency feels an alternate metric or an alternate unit of measurement for the same metric is a better descriptor of the progress and results of an MTW activity, the agency can choose to also report that data, but the applicable standard metrics must be reported on exactly as presented in Form 50900.

2. **Adjusting Metrics for External Impacts – How should MTW agencies account for the impact of factors outside of the MTW activity that often make a great deal of difference over time, such as increases in utility rates, changes in the economy and rental market, and inflation?**

   MTW agencies are not required to account for these factors when reporting on standard metrics, but can explain in the body of the Plan/Report if they feel the impacts of such factors warrant further explanation. If an agency wishes to create additional metrics that do control for such factors and report on those also, it may of course choose to do so.
3. **MTW Statutory Objectives** – How should MTW agencies account for activities targeting one MTW objective that may have a detrimental impact on other objectives, such as self-sufficiency outcomes that offset cost savings from efficiency-oriented MTW strategies? For example, MTW agencies may encounter additional maintenance and turnover costs from housing more difficult to serve populations in MTW programs targeting specific populations. This may result in an overall increase in average unit costs and diminished total time savings from MTW inspections strategies. It is rare that an MTW activity directly furthers all three of the MTW statutory objectives, because as you note, the three objectives are often in conflict with one another. Given MTW is a demonstration, it is not expected that MTW activities further all three objectives and it is understood that there are trade-offs to each activity. These trade-offs are part of the story MTW agencies tell when reporting on each MTW activity. Thus, there is not a need to ‘account’ for this, but if an agency wishes, it can explain such trade-offs in the narrative associated with a specific activity.

**F. Section V. Sources and Uses of Funds**

HUD has not yet received questions applicable to this section.

**G. Section VI. Administrative**

1. **Lobbying Disclosures** – Section D requires the submission of the Disclosure of Lobbying Activities (SF-LLL) and the related Certification of Payments (HUD-50071).
   The PHA must submit Form HUD-50071 Certification of Payments to Influence Federal Transactions, certifying that the PHA has not and will not make any prohibited payments from federal appropriated funds. Additionally, HUD requires PHAs to submit Standard Form-LLL Disclosure of Lobbying Activities only if they have used non-federally appropriated funds for influencing or attempting to influence executive or legislative branch personnel in connection with new or renewal funding or regarding the formulation, modification, or adoption of policy or legislation. For more information on these certifications and disclosures, please see PIH Notice 2017-04.

**H. Certifications of Compliance**

1. **Signature** – Typically our Board resolutions are signed by the Secretary of the Board of Commissioners, who is also the Executive Director of the agency. In the new Form 50900, the language says the resolution should be “signed by the Board of Commissioners”. Please clarify if having a resolution signed by the Secretary of the Board (Executive Director) is acceptable.
   Yes, in this instance this would be acceptable since the role of signing resolutions has been delegated by the Board to its Secretary.

**I. Standard HUD Metrics**

1. **Table Format** – The page on the HUD standard metrics states that information "must be reported in the table format provided." Do they mean in the actual table provided? Or can we create new table in excel for inputting this data?
   HUD means that the information should be provided in the same table structure (i.e. using the same column headings, in the same order, and containing the same information) as is stated on the form. You may create your own table in Excel; however, that table should match the information required in the standard metrics table in Form 50900.

2. **Applicable Metrics** – Can you clarify whether only one standard metric is required for each activity or if multiple metrics are required?
   As stated at the top of the page listing the standard metrics in Form 50900, an agency “must use all of the applicable standard metrics listed below for each statutory objective cited.” Thus, yes, in most instances more than one metric would be applicable to the activity and statutory objective(s) cited and should be reported on. HUD will provide additional guidance during the October webcast about which standard metrics are applicable to common MTW activities.
J. Other General Questions

1. Inserting Tables – We are having a problem cutting and pasting the form into the Annual MTW Plan document. The Form does not fit the paper size.
   Our initial recommendation would be that you try pasting the tables in as images instead of as text. So, if you’re working in Microsoft Word that would mean going to “Paste Special” and selecting one of the image formats such as Enhanced Meta File or Bitmap. This way you’ll paste the table in as an image/picture, and be able to change the size easily by dragging the corners of the box. If you’re still having difficulties, please consult your agency IT staff for assistance.

2. Formatting Tables – When copying the excel tables for Sections II and V into our MTW Plan, can we change the fonts and colors of the table to match the branding and theme of the rest of the Plan document?
   Yes, you may change the fonts and colors in the Plan itself to match the look of your agency’s document; however, the content and layout of the tables should not be changed.