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**From:** James Armstrong <Jacycle@verizon.net>  
**Sent:** Thursday, August 25, 2016 4:15 PM  
**To:** MTWAdvisoryCommittee  
**Cc:** 'Tim Kaiser'; 'Deb Gross'  
**Subject:** Some thoughts concerning MTW expansion research and methods questions

**Follow Up Flag:** Follow up  
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Dear MTW Expansion Research Advisory Committee Members and MTW Office Staff:

After sitting in on the phone calls on July 26<sup>th</sup> and 28<sup>th</sup>, I had some concerns and wasn't sure how to communicate them to you all. I have harvested as many email addresses as I was able to find, and in some cases guessed at address based on general institutional practices on those addresses. I was unable to find any addresses for the residents who are participating on the committee and so I hope they receive these notes.

I was very encouraged by some of the issues that the committee raised during those 2 phone conferences and so thank you for the thoughtfulness you took in approaching this task. What follows are some issues that I don't believe arose during the calls. The Public Housing Authorities Directors Association raised some concerns that weren't clearly characterized in HUD's summary, and what follows includes one or two of those issues along with some thoughts that arose during the phone calls. I hope you find this of some help as you proceed to meet on September 1<sup>st</sup> and 2<sup>nd</sup>. I hope to join you for those meetings.

Concerns with plans for MTW expansion:

1. HUD's focus on national policy questions, coupled with ongoing dialogue with existing MTW agencies over program design elements and constraints risk losing sight of a fundamental characteristic of the MTW program.

In recent years, existing MTW agencies report significant differences with the department over the extent to which the MTW program deregulates housing authorities and facilitates local discretion and autonomy. That deregulation has permitted existing agencies to become much more responsive and creative in considering solutions to locally expressed housing needs and concentrating more federal and local resources on mission accomplishment rather than compliance and monitoring.

**HUD must structure the program expansion, research questions, and methods to complete that research, so that new MTW agencies enjoy the same levels of deregulation, local discretion and autonomy that have been the hallmark of the MTW program.**

2. HUD and the committee are operating with very incomplete information.

A number of elements in implementing this expansion bear directly on planning for research questions and methods to use with new MTW agencies, including:

- a. The number of agencies HUD plans to admit each year.
- b. The kinds of agencies HUD hopes to admit each year.
  - i. What size will new agencies be?
  - ii. Where may new agencies be located?
  - iii. What may the program mix of new agencies be?

I think that discussions of policy options under study and methods that may be used in those studies should be informed by HUD's best forecast of these characteristics. **HUD should provide the committee with its best estimates of the characteristics of cohorts of new MTW agencies.**

3. HUD's focus on "policy" questions neglects other significant impacts of MTW status on participating agencies that fit within statutory goals of the program.

Many existing MTW agencies have reported that one of the most significant impacts of the MTW program are Institutional changes at the agency that resulted from MTW participation. Some agencies have reported that:

- a. They have refocused from primarily attending to federal policies and priorities to meeting local housing assistance priorities using the federal programs and funds as tools.
- b. Their approaches have focused increasingly on accomplishing goals rather than on compliance and constraints.
- c. They have become increasingly imaginative in approaching housing needs of diverse populations and of the intersections of housing and other policy issues in their communities.

Other institutional changes that may be related to MTW program participation that may deserve research attention include:

- a. Improved financial health.
- d. Less financial distress.
- e. Less financial volatility.

**HUD should include questions that consider institutional health and innovativeness among the issues it considers for research.**

4. HUD may believe it must "lock in" potential policy questions addressed by the MTW expansion now.

It may be very helpful to potential MTW applicants to know of some of the department's research and methodological preferences early. However, doing so under current high levels of uncertainty shouldn't preclude later modifications of questions and their specifications, and preferred methods that may be informed by ongoing MTW findings and outcomes.

HUD's process to develop research questions and methodologies should be ongoing and include reviews and revisions. **The committee's role in informing those questions and methods should continue throughout the expansion period, and research questions and methods should remain open to amendment and addition until all 100 new MTW agencies are enrolled in the program.**

5. HUD's approach to framing research questions and methodologies might effectively lock large numbers of agencies out of consideration for the expansion.

During the first discussions, it seemed that certain topics and their framing might prevent some localities' participation due to local political environments if questions are framed too narrowly and uncritically. Narrowly tailored policy questions and methods risk:

- a. Selection bias favoring the largest agencies possible within the constraints of the statute due to numbers of subjects required to conduct certain forms of research.
- b. Limiting consideration of certain types of agencies (those operating one type of assistance program, those in comparatively homogenous (economically, racially, ethnically) communities or regions).
- c. Discouraging application by agencies in urban, suburban, or rural communities.

**HUD should frame research questions as broadly, critically, and thoughtfully as possible.** For example:

- a. Investigation into time limits on assistance may be framed more broadly as, "How can agencies encourage families to consider private market rental and owner occupied housing alternatives as their incomes rise?"
- d. Investigation into work requirements may be framed more broadly as, "How can agencies encourage adult, work able, non-elderly household members to seek and retain employment and to increase earned income?"
- e. Investigation into sponsor based housing may be framed more broadly as, "How can agencies identify and address housing needs of severely impacted populations in their communities, in partnerships or independently?"

I hope that this is of some help as the advisory committee continues its work in early September. I hope to see you at those sessions, and I want to reiterate my admiration for your commitment and your frank feedback as you've worked to provide the department with helpful advice.

Sincerely,

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