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Founded in 1974 by
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Colette Pollard

Reports Management Officer, QDAM

U.S. Department of Housing and Urban Development

451 7th Street SW, Room 4176

Washington, DC 20410-5000

Via regulations.gov

Re: FR-7076-N-05

60-Day Notice of Proposed Information Collection: Family Report, MTW
Family Report, MTW Expansion Family Report; OMB Control No. 2577-
0083

The National Low Income Housing Coalition (NLIHC) is dedicated solely to achieving racially and socially equitable public policy that ensures people with the lowest incomes have quality homes that are accessible and affordable in communities of their choice. Our members include state and local housing coalitions, residents of public and assisted housing, nonprofit housing providers, homeless service providers, fair housing organizations, researchers, public housing agencies, private developers and property owners, local and state government agencies, faith-based organizations, and concerned citizens. While our members include the spectrum of housing interests, we do not represent any segment of the housing industry. Rather, we focus on policy and funding improvements for extremely low-income people who receive and those who need federal housing assistance.

NLIHC is writing to endorse the proposed changes to HUD Form 50058, the Family Report, used by HUD's Office of Public and Indian Housing (PIH) to obtain information about households assisted by the Public Housing and Housing Choice Voucher programs in order to understand the characteristics of the people served by these essential federal housing assistance programs. The information available in Form 50058 also helps PIH monitor those programs and the public housing agencies (PHAs) that administer the programs. Comprehensive information about the households assisted also enables researchers and advocates to assess the programs and make policy recommendations.

Proposed Changes to Section 2: Action

NLIHC supports all of the proposed changes to Section 2: Action. For example, adding codes for “PBV Transfer to Tenant-Based Voucher” can offer clues about the extent to which households take advantage of the PBV program’s option to move with a tenant-based voucher after one year, a key mobility provision.

Adding a question to indicate the primary reason a household ends its participation in the program can indicate problems a PHA needs to address, or it can suggest success households achieved toward greater economic self-sufficiency. However, NLIHC emphasizes that it is not sufficient to simply use the HUD-50058-MTW Expansion options of “Tenant Initiated” and “Nonpayment of Rent” as codes. There must be an opportunity to refine each. For example, for “Tenant Initiated,” was it because the household moved to a different city? Did their income increase to the point that they became over-income? Was the resident unable to secure a VAWA transfer? Was the quality of housing so poor that the household thought they would be better off elsewhere?

Adding a “Nonpayment of Rent” code as a reason a household leaves a program can be particularly salient information and we support it. However, NLIHC thinks entering this as a code without elaboration is insufficient; additional information should be ascertained regarding the reason a household could not pay rent. For example, was there a serious health crisis, job loss, or some other drastic event? If so, did the PHA offer a hardship exemption, a flexible repayment plan, budgeting assistance, or some other means to help the household weather the event?

Adding the date a household vacated an HCV unit, when paired with the existing information about when the household was admitted to the program, provides data about the length of stay on the program, information useful to researchers and policy advocates.

The addition of a question about the reason a household obtains an interim reexamination is valuable, as the recent pandemic demonstrated. We suggest an additional question to indicate whether a rent adjustment due to a reexamination was applied retroactively to the date the household’s income declined, not when the household applied for a reexamination.

Proposed Changes to Section 3: Household

Gender/Sexual Identity

NLIHC supports replacing the word “sex” with the word “gender” at 3g and adding to “M=Male,” “F=Female” in the guidance instructions, “X-Non-Binary/Transgender,” an option to pick more than one response, and “NR-Response/Prefer not to answer.”

NLIHC also endorses requesting information about sexual orientation, including the categories listed in the notice, with the addition of “Intersex” which was included in Executive Order 14075.

NLIHC suggests the question apply not only to the head of household, but to all members of a household because a household's admission and continued occupancy could suffer from discrimination even if the head of household is not LGBTQI+.

Race

While NLIHC supports expanding options under the race box at 3k, we do not think "Other" is an appropriate choice. In the context of race, "other" has very serious negative connotations – the feared or denigrated "other" who is not like "us." We suggest "Some Other Race" as used by the decennial census and the American Community Survey.

We also suggest adding Middle Eastern or North African as proposed by OMB this January. (Currently, the census includes persons of Middle Eastern or North African descent as White, but many people who are Middle Eastern or North African do not consider themselves as White.) NLIHC also suggest adding "Multiracial" or "Mixed-Race or Biracial."

Proposed Changes to Section 4: Background at Admission

NLIHC supports a new line to indicate a date when a household was selected from the waiting list. This, when compared to the existing date when a household entered the waiting list (at 4), can indicate the length of time households have been on the waiting list, and in conjunction with other characteristics on Form 50058 can suggest which household characteristics might benefit or suffer from a PHA's preferences policies.

A new question to ascertain whether a household was formerly homeless can reflect the extent to which a PHA's policies attempt to address homelessness and the success of such policies.

We also endorse a new question regarding whether a household transitioned out of an institutional setting, reflecting a PHA's policies and practices consonant with *Olmstead* principles.

NLIHC supports the proposed changes (except the use of "Other" for race) and offers additional suggestions that taken together can provide valuable information for PIH, PHAs, researchers, and policy advocates with the aim of improving the nation's ability to help meet the affordable housing needs of extremely low- and very low-income households.

If we can clarify any of our suggestions, please contact Ed Gramlich, Senior Advisor, at ed@nlihc.org or 202.662.1530 x 314.

Ed Gramlich
Senior Advisor