VIA ELECTRONIC MAIL

October 1, 2012

HUD Desk Officer
Office of Management and Budget
New Executive Office Building
Washington, DC 20503


To Whom It May Concern:

The National Association of Housing and Redevelopment Officials (NAHRO) is pleased to submit comments in response to the Department of Housing and Urban Development’s (HUD’s) Proposed Information Collection for the PHA Burden Reduction Survey. NAHRO represents more than 3,100 agencies and over 20,000 individual members and associates. Collectively, our membership manages over 970,000 public housing units, or approximately 83 percent of the entire inventory, as well as 1.7 million vouchers. Clearly our members have a vested interest in any effort to reduce the burdens placed on PHAs.

NAHRO is pleased that the Department continues to be interested in finding ways to reduce administrative requirements for PHAs. As federal appropriations for managing the Public Housing and Housing Choice Voucher program continue to fall short of need, PHAs have worked tirelessly to streamline and create efficiencies in their programs within the confines allowed under existing program regulations and HUD’s administrative systems. While these local efforts have aided PHAs to operate with fewer resources, additional administrative, regulatory, and statutory reforms are needed by HUD to reduce the requirements placed on PHAs. We believe that the Department’s Delivering Together initiative is a helpful element in this process. NAHRO continues to work with the Department to realize these reforms, and the enclosed comments to the proposed information collection are intended in the spirit of our ongoing collaborations.

In addition to detailed comments regarding the actual survey questions, which are included in an annotated version of the survey appended to this response, we would like to offer some more general comments and observations. NAHRO’s overarching concern is that the survey questions are not clearly tied to concrete burden reduction items. One way of ensuring that there is a strong connection between the survey questions and actionable burden reduction recommendations would be to start with the recommendations previously submitted to the Department by NAHRO and others, including the requests for regulatory waivers that have been submitted. With this starting...
point, questions could be devised to more precisely gather the information needed to assess the impact that such changes would have as well as their feasibility. At present, this link to potential actions is not apparent for many of HUD’s proposed questions.

From an operational perspective, the survey asks several questions about the knowledge and experience of the individual completing the form. Given the variation in PHAs depending on size and staffing configurations, NAHRO has doubts about the usefulness of the data collected by these questions. Many PHAs participate in only one program, and even at combined agencies, the individual completing the form may have more knowledge about one program than another. As a result, survey data will be skewed by the perspective of the individual assigned to complete the form and may not provide accurate representation on the whole.

NAHRO is concerned that this information collection is proposed to be mandatory. There is a certain element of irony inherent in an effort intended to reduce burdens which, in and of itself, creates a new, incremental burden. We recommend that the survey be made optional, allowing PHAs to voluntarily submit responses. We also recommend that a careful evaluation be completed of each question to determine whether the information is already available through existing HUD systems, whether the question being asked is clear and precise, and whether the data requested is truly necessary. For example, there are a number of questions asked in this survey that appear to be duplicative of areas of examination in HUD PD&R’s existing administrative fee study. At present, we believe that many of the proposed questions do not meet these criteria, and will therefore not be useful in our collective efforts to reduce the administrative burdens placed on PHAs.

We appreciate the Department’s continued commitment to the important work of reducing administrative burdens placed on PHAs. If NAHRO can assist in any way, please do not hesitate to contact us.

Sincerely,

Tamar Greenspan
Policy Advisor, Public and Affordable Housing