



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT  
WASHINGTON, DC 20410-3000

Frequently Asked Questions about HUD Form 50900:  
Elements for the Annual MTW Plan and Annual MTW Report  
September 17, 2013

Background

This document contains a listing of questions regarding HUD Form 50900: Elements for the Annual MTW Plan and Annual MTW Report, issued on May 31, 2013 and expiring on May 31, 2016. 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 and Microsoft Excel versions of Form 50900 can be found on the HUD website at:  
[http://portal.hud.gov/hudportal/HUD?src=/program\\_offices/public\\_indian\\_housing/programs/ph/mtw/mtwsa](http://portal.hud.gov/hudportal/HUD?src=/program_offices/public_indian_housing/programs/ph/mtw/mtwsa).

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](mailto:mtw-info@hud.gov).

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 new 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 new version of Form 50900, HUD removed the 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. **Reporting Compliance with Statutory MTW Requirements – The requirement on page 10 of the PDF references “any of the required statutory MTW requirements listed in Section II(C) of the Standard MTW Agreement”. Section II(C) of the standard MTW agreement references the requirement for public hearings. Should this be Section II(D)?**

Yes, this is a typo on the Form. The correct reference should be to Section II(D).

7. **Reporting Compliance with Statutory MTW Requirements – Because this is part of the planning document for the following year, at what point in time is this measuring compliance? (see page 10**

of the PDF) Anticipated compliance for the beginning of the Plan year? Compliance at the time of submission?

The PHA is not being asked to assess its own compliance, but instead, to report on plans to return to compliance if it is deemed out of compliance. If a PHA is deemed out of compliance with one or more of the statutory MTW requirements, HUD (via the MTW Office) will communicate that to the PHA in writing. If you have not received such a communication and believe your agency to be in good standing, you can simply state that this section is Not Applicable at this time.

8. Reporting Compliance with Statutory MTW Requirements – As we understand it, reports on newly admitted households below 50 percent of AMI and Unit Months Leased are readily available in PIC for either non-MTW PHAs or HUD. Will HUD make these reports available to MTW PHAs so that each agency does not have to duplicate them?

Based on the information required by the new Form 50900, an MTW agency would not be asked to provide this information, thus there is no duplication of effort. The information requested in part B of Section II of the MTW Report only asks for this information for local, non-traditional households, because that information is not available in PIC currently. HUD will use its internal data for public housing and HCV families, combined with agency-provided information on local, non-traditional families to assess compliance with this statutory MTW requirement.

9. 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?

As per our responses to questions from the 3rd public comment period, 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 would list 'public housing' as the housing program and 'site-based' as the waiting list type. 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 list the waiting list type as 'other', and describe that the program was using a combination of waiting list structures.

10. 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. In the notes area below the waiting list table you would clarify which population the list is open for.

11. Wait List Information – The second table requires "Housing Program and Description of the populations for which the wait list is open". Is this just a reference to providing a description for partially open waitlists (per the third footnote above the table), or does this table require these elements for each of our housing program waitlists?

The description would be required for each applicable housing program. For example, you would only report information on the population a partially open waiting list is open for in instances where a list is partially open. If the list were not partially open, it would not require information in the notes for partially open waiting lists.

12. Wait List Information – Many of our Local, Non-Traditional programs do not have traditional waitlists. They may accept applicants only when they have an opening, they may create a new list on the first of each month, or they may have other ways of selecting participants for the program. If these programs do not have waitlists, do they need to be included in this section? For waitlist type, would it be described as "None" (the parenthetical description of that type is confusing) or "Other"? If a particular housing program does not have a waiting list, then you would not report on a waiting list for that program and could list it as "None." If a housing program uses an alternate waiting list structure (such as creating a monthly list, per your example), then you would cite "Other" and explain what "Other" references for this program in the notes box below the table.

13. Wait List Information – We currently operate a hybrid system we call site preference. This allows applicants for public housing to either choose communities of preference (up to three), much like a traditional site based list. We also allow families to choose a 'first available' option, which essentially puts them on all the list for which they are eligible based on bedroom size, etc. The new format asks for us to list each type of list, and to identify a list type. Our intent is to list the public housing waiting list once, list is as a site-based preference list, and show the total unduplicated number of families on our public housing lists. In our report, we will provide the total unduplicated numbers, and will add a supplemental listing of the waiting list numbers for each specific property. Please let me know if you think this approach is acceptable. This approach is generally acceptable, but the list should be characterized as site-based (the applicable choice from the list provided in Form 50900), not site-based preference.

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. Closing Out Activities – If we are planning on eliminating an initiative for 2014 – and not renewing. Do we follow the format in the new Attachment B and then not worry about the applicable metrics etc.  
Yes, you should move the activity to Section IV.D. Closed Out Activities. The information for closed out activities in the Plan does not include metrics, and you will say the activity was closed in FY13. The activity should be formally closed out in the FY13 Report, and at that time, you can use the metrics you created under the former version of Form 50900 to discuss the outcomes of the activity.
2. Metrics – Regarding baseline and sampling, we believe it makes most sense to us to take a random sample of 10% of our MEI households at the beginning of the fiscal year and track them specifically to see the outcome at the end of the fiscal year. That way we can clearly see what is happening to that sample over time. We would take a new baseline group at the beginning of each fiscal year and look at the results at the end of each fiscal year. This is a different approach to the baseline concept than we have done in the past, but it makes the most sense to us for this particular initiative. We might also consider looking at the specific baseline group and their outcome at 2 years and 3 years but don't want to promise how many years we would track each baseline group. Before we proceed with this approach, we would like to get an indication that this approach will be acceptable. Both under the expired Form 50900 and the new Form 50900, a baseline must be established and then compared against over time; a new baseline value cannot be established each year. This is necessary in order to see the impacts of an MTW activity over the duration of its implementation. Regarding sampling only 10% of the households subject to the activity, HUD does not believe this would provide an accurate assessment of the activity's outcomes for affected families. The entire population of participants subject to this activity should be tracked each year, and compared to the baseline values.
3. Implemented Activities – For ongoing, implemented activities that may need additional standard metrics, should those metrics be added in the Annual Plan, or the Annual Report?  
When an agency submits its first required document in the new Form 50900 format, applicable standard metric information should be listed for all approved MTW activities in parts A, B, and C of Section IV. This entails listing the relevant standard metrics and the baseline and benchmark values for each metric. If an agency's first required document in the new format is a Plan, the agency will list the standard metrics in this Plan and report on their outcomes in the same year's Report. If the agency's first required document in the new format is a Report, the agency will list the standard metrics in this Report and report on their outcomes in the next year's Report.
4. Implemented Activities – We have an April 1<sup>st</sup> fiscal year start, so the first time we submit a Report in the new format (in June 2014), it will be for a Plan that was submitted in the old format. Are we required to report on standard metrics for activities in that Report, even though the Plan did not include the intention to measure those metrics?

The first document your agency is required to submit in the new format is the FY15 Plan, due in January 2014. In the Plan you are required to lay out the applicable standard metrics with baseline and benchmark values for all proposed and ongoing activities. So, by the time your FY14 ends and you are working on the Report (due in June), you will know the applicable standard metrics and should make an effort to report on the ones where you have data available. HUD does recognize there may be some standard metrics that require new data collection (outside of what is in PIC data, existing administrative data) and for those metrics an agency may not have been collecting data during the fiscal year with which to report.

5. **Baseline Values** – For ongoing, approved MTW activities, does HUD expect MTW agencies to provide a baseline for the year prior to implementation? For some of SHA’s MTW activities, the baseline year would be 15 years prior and this data is simply not available. If we instead use the first year of reporting on the new metrics as our baseline year, how do we account for the fact that the activity is already in place and therefore less likely to realize dramatically different results in future years?

As per HUD’s responses to the third public comment period on Form 50900 and the changes made in the final, approved version of the Form, no, HUD does not expect agencies to provide a historical baseline for activities that are already implemented and ongoing. While as you note that would be ideal, we recognize that it is not possible for many agencies to do. Thus, as was done when MTW agencies transitioned to a new Attachment B in 2008, the baseline should be established using data from the year prior to implementation of the new metric(s). This will mean that for many cost savings activities the immediate cost savings realized upon implementation of the activity will not be reflected. If an agency has and wishes to provide a historical baseline to more accurately convey the savings, HUD would appreciate that data, but if not, then the data will simply show a stable rate of cost going forward.

6. **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 SHA MTW activities for which per unit reporting is more appropriate, such as inspections. While SHA has found MTW inspections strategies to be successful in generating efficiencies, this cannot be accurately captured as a total, because SHA 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.

7. **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.

8. **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.

9. Closed Out Activities – For this first submittal, how far back to we need to include activities that have never been implemented or are discontinued? Do we need to pull activities further back than the year before the Plan we're submitting?

MTW agencies should make their best effort to include all relevant activities in the first submittal, but if there are closed activities that are missed in the first submission, they can be added in future submissions.

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

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

#### G. Section VI. Administrative

1. Annual Statement/Performance and Evaluation Report – We are concerned regarding the reference to the P&E report. Is this only for Capital Funds that are not considered part of MTW and the other information would be subject to a new MTW form that HUD may create? Our agency has reached a method of reporting on Capital Fund issues with our Local Office that meets their need and our obligations. Can you provide additional clarity for this part of the Plan?

Under the new Form 50900, PHAs are required to provide Annual Performance and Evaluation forms (50075.1) for active MTW and non-MTW Capital Fund Grants. There will not be a separate MTW form created. However, an MTW agency can list its capital funds under BLI 1492 if the funds are being block granted.

2. Annual Statement/Performance and Evaluation Report – The form is required for each grant "that has unexpended amounts". When is the date for those amounts to qualify as "unexpended"? Is this as anticipated by the beginning of the Plan year? By the end of the Plan year? By date of submission?

If a specific grant will have unexpended amounts at any time during the fiscal year covered by the Plan, then a P&E should be completed for that specific grant.

3. Why is HUD requesting that agencies submit their 50075s with the plan rather than with the report? It would be more appropriate to include at the close of the year with our annual report. We develop our annual MTW plan and annual capital budget simultaneously, including submitting for Board approval at the same meeting, which means that we will never have a Board-approved budget with which to create the 50075s in time for their submission with the MTW plan.

As stated earlier in this FAQ, in regards to 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 or P&Es based on the Board hearing and approval, those updates could be made prior to submission to HUD. This would also provide time for the agency to complete the 50075 forms. It is also important to note that for most MTW PHAs which block grant their capital funds, the total capital funds are simply listed on BLI 1492, and not broken out into various lines.

#### 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. The Microsoft Excel file containing all Section II and V tables should retain its standard color and fonts when you submit it to HUD for review as part of the complete submission.

3. **Implementation Timeline - On what basis and to what purpose is HUD requiring MTW agencies that have already submitted their 2013 MTW plans in the old format to submit their 2013 MTW reports in the new format? Under the first amendment to the MTW agreements, it specifically states that we will provide reports in the same format as the plan for the fiscal year. It would defy common sense to use different definitions for projections and reporting, since there is otherwise no basis for comparison using common definitions.**

Inquiries from Congress, industry groups, and other stakeholders require information that MTW agencies will report in the revised Form 50900. Thus, as HUD has conveyed previously to the MTW agencies, HUD cannot delay the implementation of the new form for the length of time that would be required to match Plan and Report formats. In regards to the First Amendment language, this language refers to the transition to the new Attachment B that occurred in 2008 and is not written to imply applicability to all future reporting changes.