

# PRRAC

## *Poverty & Race Research Action Council*

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April 18, 2016

Assistant Secretary Katherine O'Regan  
Office of Policy Development and Research  
U.S. Department of Housing and Urban Development  
451 7<sup>th</sup> Street S.W.  
Washington, DC 20410

Assistant Secretary Lourdes Castro Ramirez  
Principal Deputy Assistant Secretary, Office of Public & Indian Housing  
U.S. Department of Housing and Urban Development  
451 7<sup>th</sup> Street S.W.  
Washington, DC 20410

Re: Improving AFFH data reporting for MTW agencies

Dear Assistant Secretaries O'Regan and Castro Ramirez,

We are writing to raise a civil rights data reporting question involving the Housing Choice Voucher program which, to the best of our knowledge, remains unresolved.

Although there have been significant advances in the data tools provided by HUD, especially during the development of the data tools relating to the AFFH Rule, many advocates and researchers still rely on the HUD Resident Characteristics Report (RCR) to understand the aggregate demographic income information for households assisted by Section 8 and Public Housing, and the distribution of Housing Choice Vouchers within a jurisdiction. The RCR is a particularly valuable tool to supplement the various AFFH data tools in that it allows stakeholders to disaggregate the numbers of vouchers *from different PHAs* within a particular geography.

Unfortunately, in many regions throughout the county, the RCR can only provide a partial snapshot of the demographic and income information of assisted households because the "RCR report does not include tenant information submitted to Moving to Work (MTW) module in IMS/PIC."<sup>1</sup> Nationally, there are 39 participating MTW sites with 430,000 voucher and public housing units.<sup>2</sup> The expansion of the Moving to Work (MTW) demonstration to an additional 100 public housing authorities provided for in the 2016 Omnibus Appropriations bill will greatly increase the number of households

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<sup>1</sup> [http://portal.hud.gov/hudportal/HUD?src=/program\\_offices/public\\_indian\\_housing/systems/pic/50058/rcr](http://portal.hud.gov/hudportal/HUD?src=/program_offices/public_indian_housing/systems/pic/50058/rcr)

<sup>2</sup> <http://www.cbpp.org/research/housing/senate-expansion-of-moving-to-work-block-grants-would-sharply-cut-number-of>

excluded from the RCR. This exclusion of MTW agency data in the RCR is a significant loophole which imposes real constraints on stakeholders wanting access to key AFFH data that allows them to understand the very basic characteristics of assisted households, and the distributions of vouchers by originating PHA within a jurisdiction. As HUD has moved towards greater transparency in data, the missing MTW data in the RCR is a stark contrast to this trend.

We appreciate your attention to this matter and we hope that HUD will continue to give all stakeholders greater access to data that can serve as a building block to understand the composition of assisted households, a key component of the Assessment of Fair Housing.

Sincerely,

A handwritten signature in black ink, appearing to read 'Philip Tegeler', with a long horizontal flourish extending to the right.

Philip Tegeler  
Executive Director  
202-360-3906