

This is a summary of 12 comments of 40 single-spaced pages received in response to the above notice. Each of the comments is noted and summarized. Survey respondents will rate agencies that serve as Performance-Based Contract Administrators (PBCAs) on customer satisfaction for FY 2012.

Insight has carefully reviewed the comments and addressed them by making revisions to the surveys. Insight met with HUD on June 18, 2012 to discuss the comments and proposed revisions. Insight recommended to HUD that the tenant survey should be eliminated, as suggested by many of those commenting, as few tenants will know of the PBCA or have any exposure to it or basis on which to respond to a survey.

Several comments suggested that HUD specify the criteria for determining eligibility for incentive fees. This is not a responsibility of Insight Policy Research, which developed and will administer the surveys.

Iowa Finance Authority, Carole S.Vipond, Director, Section 8 (May 11, 2012)

Note: PBCA to be rated for FY2012

- Expressed previously cited concerns to HUD on the Annual Contributions Contract (Project-based Section 8 Contract Administration)
- Concerned that tenants will not understand who the contractor is and be unable to respond
- Provided 10 specific suggestions on changes to the Survey of Owners
- Provided 2 specific suggestions on changes to the Survey of Tenants

New York State Housing Trust Fund, Jackie Robotti, Project Director, Section 8 Contract Administration (May 10, 2012)

Note: May be rated in future surveys

- Provided general feedback on draft Survey Design and Prototype Report (Nov. 25, 2011)
- Provided 10 specific comments or suggestions on changes to the Survey of Owners
- Expressed concern over the plan to assess tenant satisfaction based on the limited number of tenants who have interacted with the PBCA
- Provided 7 specific comments or suggestions on changes to the Survey of Tenants

Minnesota Housing Finance Authority, Lori Lindberg, Housing Policy Specialist (May 9, 2012)

Note: PBCA to be rated for FY2012

- Expressed concern over the plan to assess tenant satisfaction based on the limited number of tenants who have interacted with the PBCA
- Provided 19 comments (many with multiple subcomments) on overall project design or suggestions with various changes to the Survey of Owners or Survey of Tenants or overall design

MassHousing, Joseph Hughes, Subsidy Manager (May 11, 2012)

Note: May be rated in future surveys

- Expressed general concern about ACC and rating the PBCA
- Commented on design of survey in the draft Survey Design and Prototype Report
- Commented on metrics and data analysis for using the surveys
- Provided 11 specific comments or suggestions on changes to the Survey of Owners
- Provided 6 specific comments or suggestions on changes to the Survey of Tenants

National Housing Compliance, John Nocheherly, Senior Compliance Manager (May 11, 2012)

- Provided minor feedback on draft Survey Design and Prototype Report
- Suggested wording changes on 5 questions to the Survey of Owners

Du & Associates, Lucie Du (May 11, 2012)

Note: Partner in Pennsylvania Multifamily Asset Managers (see below), which may be rated in future surveys.

- Concerned that tenant survey will confuse respondents, who will not know who they are evaluating
- Inquired about how results will affect PBCA fees and appeals process, if any
- Commented on design of survey in the draft Survey Design and Prototype Report
- Provided 4 specific comments or suggestions on changes to the Survey of Owners
- Provided 4 specific comments or suggestions on changes to the Survey of Tenants

Pennsylvania Multifamily Asset Managers, Jason Long (May 11, 2012)

Note: May be rated in future surveys

- General comment about identifying cause of satisfaction/dissatisfactions for owners and tenants
- Concerned that tenants will not have a place to address concerns about management

National Affordable Housing Management Association, Kris Cook, Executive Director (May 11, 2012)

- Strongly supports surveys
- Suggests expanding owner survey to all owners and estimated that additional effort/burden would be minimal
- Concerned about burden on owners for gathering tenant lists
- Provided minor specific comments or suggestions on changes to the Survey of Owners that affect multiple questions
- Suggested more opportunities for open-ended comments by owners
- Suggested eliminating tenant questions on living conditions
- Provided several wording changes or comments on a small number of tenant questions

National Council of State Housing Agencies, Garth Rieman, Director Housing Advocacy and Strategic Initiatives (May 11, 2012)

- Concerned about tenants having sufficient exposure to PBCA to respond and recommends its use be minimized if conducted as planned
- Believes there is a potential for negative ratings based on not receiving desired responses regardless of performance
- Suggests focus on customer satisfaction questions
- Recommends that HUD should determine threshold for incentive fees I advance

National Leased Housing Association, Denise Muha, Executive Director (May 11, 2012)

- Questions the usefulness of the tenant survey
- Suggests that questions in the owner survey that are not related to customer satisfaction or are redundant with data already collected by HUD be eliminated

- Provided detailed suggestions for rewording some of the specific questions in the owner survey to accomplish the above goal

Columbus Metropolitan Housing Authority, dba as Assisted Housing Services Corporation, Stephen Havens, Senior Program Analyst

Note: May be rated in future surveys

- Suggests HUD develop criteria for qualifying for incentive fees
- Doubts the relevance of or suggest changes to multiple survey questions
- Expresses doubts about how tenants could judge the PBCA

Oregon Housing and Community Services, Rhonda Crawford, HUD Contract Administration Manager

Note: May be rated in future surveys

- Concerned about objectivity of respondents, both owners and tenants