#### U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT



OFFICE OF PUBLIC AND INDIAN HOUSING

## **Special Attention of:**

Public Housing Agencies; Public Housing Hub Office Directors; Public Housing Program Center Directors; Regional Directors; Field Office Directors; Resident Management Corporations **NOTICE: PIH-2024-12 (HA)** 

Issued: April 24, 2024

Expires: This notice remains in effect until amended, superseded, or

rescinded.

**Cross References:** 

24 CFR § 5.233, 902, 905, 982, 983,

985, 990

PIH Notice 2011-65 (HA)

PIH Notice 2014-24 (HA)

PIH Notice 2016-08 (HA)

PIH Notice 2016-09 (HA)

**PIH Notice 2018-18** 

PIH Notice 2018-24

PIH Notice 2019-13 (HA)

PIH Notice 2019-14 (HA)

PIH Notice 2022-03 (HA)

**PIH Notice 2023-25** 

**PIH Notice 2023-27** 

PIH Notice 2024-03

Subject: Housing Information Portal (HIP) Implementation

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### 1. Purpose.

This notice describes the process for Public Housing Agencies (PHAs) and their software vendors to transition from the Inventory Management System/Public and Indian Housing (PIH) Information Center (IMS/PIC) to the Housing Information Portal (HIP).

With this notice, HUD is announcing that PHAs will no longer be able to access IMS/PIC as of a "Transition Date" anticipated to be in late Summer 2024. Following the Transition Date, PHAs should expect a "Transition Period" before the HIP system will be available for their use. HUD anticipates that HIP's "Opening Date" will be in Fall 2024.

This notice provides details on the transition process, including actions that PHAs must take prior to the Transition Date, during the Transition Period, and following the HIP Opening Date, to support the orderly shift to HIP and sunset of IMS/PIC as the PIH system of record. The HIP system will be the official system of record that HUD will use to determine Public Housing Capital Fund and Operating Fund grant amounts and to assess statutory and regulatory compliance in the Public Housing, Housing Choice Voucher, and Mod Rehab programs.

### 2. Applicability.

This notice applies to Public Housing Agencies (PHAs) administering the Low-Rent Public Housing (PH) program; Section 8 Housing Choice Voucher programs (HCV), including Tenant-Based Vouchers, Project-Based Vouchers (PBVs), and Homeownership Vouchers; and the Section 8 Moderate Rehabilitation (Mod Rehab) program. It applies to PHAs that participate in the Moving to Work (MTW) Demonstration and non-MTW PHAs.

This notice does not apply to Tribes and Tribally Designated Housing Entities (TDHEs) that use the Tribal HUD-VASH module in HIP. HUD's Office of Native American Programs (ONAP) will issue a separate notice about reporting in this module.

## 3. Background.

HIP is the Office of Public and Indian Housing's (PIH's) new and enhanced system to replace IMS/PIC. HIP will replace IMS/PIC in collecting information on households served through the Public Housing, Housing Choice Voucher, and Mod Rehab programs as detailed on the Family Report form HUD-50058, HUD-50058 MTW, and HUD-50058 MTW Expansion (collectively referred to as "HUD-50058 forms" in this notice) and information on the physical inventory of Public Housing buildings and units. HIP will accept and facilitate processing of inventory removal applications (form HUD-52860). HIP also allows Expansion MTW PHAs to submit the MTW Supplement to the Annual PHA Plan and allows Tribes and TDHEs to submit household information for the Tribal HUD-VASH program.

HUD expects future development of HIP to support the annual Capital Fund certification for PHAs operating Public Housing programs; the Section Eight Management Assessment Program (SEMAP) for PHAs operating HCV programs; the collection of PBV Housing Assistance Payments (HAP) Contract information; and the submission of Annual and 5-Year PHA Plans.

The HIP system will be foundational to the operation of PIH programs. PIH will use data collected in HIP for all its core business functions including, but not limited to, compliance with laws and regulations, income verification, maintaining Public Housing inventory data used for inspections, and evaluating program performance. HIP will replace IMS/PIC as the basis for the calculation of Public Housing Operating Fund and Capital Fund grants. In the future, PIH expects to calculate HAP under its HCV programs based on information reported in HIP.

HIP was designed to make PIH programs easier to operate, more efficient, and more secure. It is based on modern cloud technologies and compliant with the Federal Risk and Authorization Management Program (FedRAMP) standards. Compliance with FedRAMP enhances protection of sensitive information, including personally identifiable information (PII) on participants in PIH programs, and should result in fewer system outages. HIP offers flexibility to enable HUD to adapt the system when needed for changes in laws, regulations, and policies.

HUD expects that HIP will integrate with software used by PHAs for form HUD-50058 submissions. PHAs that use vendor software will be able submit and correct form HUD-50058 data through their vendor software interface instead of having to log in to the HIP web interface. HIP will offer an updated, more user-friendly version of the HUD Family Reporting Software (FRS) that will be a web-based form for PHAs that opt to not use vendor software to transmit information to HUD. HUD will refer to this functionality as the "Fillable 50058." However, HUD will not provide fillable 50058 functionality for the MTW Expansion or MTW versions of these forms. Consistent with Section 7 of the MTW Operations Notice (85 FR 53444), Expansion MTW PHAs must upgrade their software to an approved system that supports the submission of MTW tenant data to HUD systems.

The enhanced technology used by the HIP system will also enable critical new policy initiatives, including the expansion of the MTW Demonstration and programmatic changes resulting from the Housing Opportunity Through Modernization Act of 2016 (HOTMA) (Pub. L. 114-201, 130 Stat. 782). IMS/PIC accepts only the "2020 version" of the form HUD-50058 and cannot accept the updated "2024 version" of the form HUD-50058, which includes changes required for HOTMA. HUD will not update IMS/PIC for this functionality and, instead, requires that PHAs use HIP as part of implementing the HOTMA-compliant 50058 form. PHAs may view Portable Document Format (PDF) versions of these forms on the HIP Technical Information web page at: <a href="https://www.hud.gov/program\_offices/public\_indian\_housing/hip/techinfo">https://www.hud.gov/program\_offices/public\_indian\_housing/hip/techinfo</a>

Table 1: Timeline for the Roll-Out of HIP Functionality

HIP System Functionality	Anticipated Date of Availability		
Building & Unit			
General Building & Unit	Opening Date (Fall 2024)		
Capital Fund Annual Certification	To Be Determined		
Inventory Removals	Opening Date (Fall 2024)		

<sup>&</sup>lt;sup>1</sup> The "2020 version" of the form HUD-50058, was approved by Office of Management and Budget (OMB) on 6/30/2020. The 2020 version does not include changes required under HOTMA. The "2024 version" of the form HUD-50058, available at <a href="https://www.hud.gov/program\_offices/public\_indian\_housing/hip/techinfo">https://www.hud.gov/program\_offices/public\_indian\_housing/hip/techinfo</a>, was approved by OMB on 9/27/2023.

HIP System Functionality	Anticipated Date of Availability			
Tenant Data				
2020 Versions of 50058 – Vendor Submissions	Opening Date (Fall 2024)			
2020 Version of Fillable 50058	Opening Date (Fall 2024)			
2024 Versions of 50058 – Vendor Submissions *	No Later Than January 1, 2025			
2024 Version of Fillable 50058 *	No Later Than January 1, 2025			
PHA Plans *				
Five Year Plan	To Be Determined			
Annual Plan	To Be Determined			
Other Functionality				
MTW Supplement *	Currently Available			
PBV HAP *	To Be Determined			
SEMAP	To Be Determined			
Tribal HUD-VASH *	Currently Available			

<sup>\*</sup> New functionality not previously available in IMS/PIC

#### 4. Establishment of HIP as the Successor System to IMS/PIC.

Because HIP is the successor system to IMS/PIC, all requirements previously detailed in notices applying to IMS/PIC apply to HIP and should be followed within HIP once PHAs gain access to the new system. A few of these are highlighted below. Further, requirements detailed in notices applying to the form HUD-50058 Family Report apply to the 2020, 2024, and successor versions of the regular form HUD-50058, form HUD-50058 MTW, and form HUD-50058 MTW Expansion. HUD reminds PHAs that they remain responsible for maintaining all inventory information in official HUD systems.

- Official Public Housing inventory. Per PIH Notice 2019-14, all public housing property<sup>2</sup> that is subject to the Annual Contributions Contract (ACC) must be documented in IMS/PIC under a development number. This requirement applies to HIP.
- *Timely submission of HUD-50058s.* PIH Notice 2011-65 requires PHAs to submit form HUD-50058s and Family Self-Sufficiency Program (FSS) Enrollment, Progress, and Exit reports within 60 calendar days from the effective date. This requirement applies to HIP.
- Reporting on the Family Self-Sufficiency Program (FSS). PHAs remain responsible for accurate reporting on their FSS program. HUD anticipates publishing guidance to assist PHAs in reporting on the FSS program through the Supportive Services Programs (SSP) Addendum to the 2024 versions of the form HUD-50058 and an update to PIH Notice 2016-08.

<sup>2</sup> Public housing property is any real property acquired, developed, modernized, maintained, or operated with United States Housing Act of 1937 (the 1937 Act) funds (other than Section 8 assistance provided under the 1937 Act), including vacant land, appurtenances (e.g., public housing common areas and playgrounds) or non-dwelling property acquired with 1937 Act funds.

- *Timely submission of Unit Tenant Status changes*. PIH Notice 2024-03 requires PHAs to submit requests for HUD approval of unit status changes within 30 days of the requested effective date and make the submission in IMS/PIC within 60 days. This requirement applies to HIP.
- Timely reporting of changes in Unit Designations and Accessible Designations. PIH
  Notice 2022-03 requires timely updates to Unit Designations and Accessible
  Designations in IMS/PIC. This requirement applies to HIP.

# 5. Overview of Transition to HIP.

To facilitate the shift from IMS/PIC to HIP, PHAs should expect a period of approximately two months in which neither system is available. Expectations for the Transition Period are described in Section 5.2. During this time, HUD will not enforce the timely reporting requirements for the applicable notices. PHAs will no longer be able to access IMS/PIC as of the Transition Date. Following the Transition Period, PHAs will gain access to HIP on the HIP Opening Date. Table 2, below, summarizes the transition process.

Table 2: Summary of Transition to HIP

<b>Transition Step or Milestone</b>	Anticipated Timeframe	
Last Day to Submit Inventory Removal	July 1, 2024	
Applications in IMS/PIC		
Deadline for IMS/PIC Building and	No Later Than Two Weeks Prior to Transition Date	
Unit Data Corrections		
<b>Transition Date</b> : Access to IMS/PIC	Late Summer 2024	
Ends		
Transition Period: No Access to	Late Summer 2024 – Fall 2024	
IMS/PIC or HIP		
HIP Opening Date: Access to HIP	Fall 2024	
Begins	* PHAs use 2020 versions of form HUD-50058	
2024 Version of HUD-50058	No Later Than January 1, 2025	
Functionality Added to HIP	* To comply with Sections 102 and 104 of HOTMA,	
	PHAs must use 2024 versions of the form HUD-50058	
	for all actions effective on or after 1/1/2025.	
Deadline to Submit form HUD-50058s	March 2, 2025	
Effective 1/1/2025	* PIH Notice 2011-65 requires PHAs to submit form	
	HUD-50058s within 60 calendar days of the effective	
	date; Submissions effective 1/1/25 must be submitted by	
	3/2/25.	

HUD is committed to avoiding and mitigating disruptions to business processes to the greatest extent possible; to communicating and collaborating with PHAs and stakeholders on expectations around these impacts; and to providing PHAs with support and technical assistance throughout the transition process. HUD will send out email and web-based communications announcing the Transition Date, Opening Date, and ability to submit the 2024 versions of the

form HUD-50058s in HIP. HUD will also post this information to the HIP web page, along with answers to frequently asked questions (FAQs), training resources via the HUD Exchange (<u>HUDExchange.info</u>), and other updates. The HIP web page is available at: <a href="https://www.hud.gov/program\_offices/public\_indian\_housing/hip">https://www.hud.gov/program\_offices/public\_indian\_housing/hip</a>

HUD anticipates publishing supplemental notice(s) in advance of the Transition Date to describe measures HUD will take and voluntary and mandatory measures PHAs will make to mitigate the impacts of the transition. The supplemental notice(s) will also provide for any flexibilities to address or mitigate disruptions to systems and processes. This guidance will discuss actions to mitigate impacts to SEMAP, the Public Housing Assessment System (PHAS), the Enterprise Income Verification (EIV) system, and other programs and processes.

# 5.1. Transition Date: Access to IMS/PIC Ends.

**PHAs will not be able to access IMS/PIC as of the Transition Date.** Therefore, in advance of the Transition Date, PHAs must ensure they complete certain tasks in IMS/PIC. Among these requirements are:

- PHAs operating Public Housing programs must complete their Federal Fiscal Year (FFY) 2025 Capital Fund Certification in IMS/PIC in accordance with the timeline posted on the Office of Capital Improvements web page: https://www.hud.gov/program\_offices/public\_indian\_housing/programs/ph/capfund
  - HUD will rely on IMS/PIC data as of the reporting date of February 29, 2024, to support the calculation of FFY 2025 Capital Fund grants.
- PHAs wishing to submit inventory removal applications must do so in IMS/PIC by July 1, 2024, to allow time for HUD review. Further information is provided in Section 7.4 of this notice.
- No later than two weeks prior to the Transition Date, PHAs must complete all updates and corrections to their building and unit inventory information in IMS/PIC. These requirements are described in Section 6 of this notice.
- Prior to the Transition Date, PHAs should ensure accurate and current tenant data. PHAs must transmit all HUD-50058 forms to IMS/PIC that are effective and due based on timely reporting requirements. However, HUD highly encourages PHAs to submit all HUD-50058 forms effective on or before the Transition Date. HUD recommends submitting these at least a few days in advance to allow time to address fatal errors in form HUD-50058 submissions. Finally, the PHA should confirm that the active households listed in internal records match those in IMS/PIC. These requirements are described in Section 6 of this notice.

Beginning with the Transition Date, users should not attempt to access the IMS/PIC system. HUD will, however, retain the IMS/PIC data for auditing purposes and in adherence with federal recordkeeping requirements and retention schedules.

### 5.2. Transition Period: No Access to IMS/PIC or HIP.

Following the Transition Date, PHAs should expect a Transition Period before the HIP system will be available for their use. During this period, HUD will migrate data from IMS/PIC into HIP, ready the system for PHA use and provide training. PHAs that use vendor software will also work with their vendors during this period to ensure readiness.

Throughout the Transition Period, PHAs must continue to conduct routine business according to HUD statutes, regulations, notices and PHA policies, except for any adjustments detailed in the forthcoming HIP supplemental notice(s). As applicable, PHAs will continue leasing to new participants in the Public Housing, HCV, and Mod Rehab programs; conducting required physical inspections; completing annual and interim reexaminations; and reporting in HUD's Voucher Management System (VMS). Tenants must continue to pay rent, and landlords participating in the voucher programs will continue to receive HAP from PHAs. PHAs must continue to document compliance with statutory and regulatory requirements during this period, securely maintain their records, and prepare to timely transmit the information to HUD once the HIP system becomes available.

### 5.3. HIP Opening Date: Access to HIP Begins.

HUD expects to grant PHAs access to HIP on the HIP Opening Date, which is anticipated to be in Fall 2024. In advance of the Opening Date, HUD will issue technical information on how users will be assigned system access. HUD may provide access to a subset of PHAs in advance of the Opening Date based on specific circumstances and to provide for an orderly rollout. Gaining advanced access to HIP will not alter deadlines or requirements established by the regulations or implementing notices. PHAs should not expect to have the ability to access HIP or use HIP functionality prior to the Opening Date.

On the HIP Opening Date, HIP will accept only the 2020 versions of the form HUD-50058 through vendor software and the 2020 version of the Fillable 50058. PHAs will proceed to submit form HUD-50058s in HIP for any actions effective after their final IMS/PIC submissions. In addition, PHAs will complete corrections required to form HUD-50058 submissions effective before the Transition Date.

On the HIP Opening Date, PHAs will also begin using the Building and Unit Inventory functionality in HIP to manage their physical Public Housing inventory. This includes reporting changes in the usage or characteristics of units (e.g., Unit Tenant Status changes, changes in available accessibility features), adding new projects including any that received approvals during the Transition Period, creating and submitting inventory removal applications through the electronic version of the form HUD-52860, and reporting removals of public housing property.

#### 5.4. No Later Than 1/1/2025: 2024 Version of HUD-50058 Added to HIP.

Following the HIP Opening Date, HUD will enhance HIP to enable PHAs to submit the 2024 versions of the HUD-50058 through vendor software and through the 2024 version of the Fillable 50058. This enhancement will enable PHAs to implement the income and assets

requirements in Sections 102 and 104 of HOTMA. PHAs must use the 2024 versions for all actions effective on or after January 1, 2025.

PIH Notice 2011-65 requires PHAs to submit form HUD-50058s within 60 calendar days from the effective date. Therefore, PHAs must submit the 2024 versions of the form HUD-50058 to HIP no later than March 2, 2025, for actions effective on January 1, 2025.

## 6. Requirements to Ensure Data Accuracy Prior to Transition Date.

Prior to the Transition Date, all PHAs must review their data in IMS/PIC and make any necessary corrections. Because this may take time, HUD suggests this work start as soon as possible. In addition, PHAs that operate Public Housing programs must review the information in IMS/PIC on their physical inventory of buildings and units; enter any corrections; and complete a building and unit submission and approval process. This section provides additional detail on these requirements. In addition, a quick reference guide is available in Appendix A highlighting key steps.

#### **6.1.** Ensuring Accurate Housing Authority Contact Information.

• *PHA General Email Address:* Prior to the Transition Date, PHAs must ensure the accuracy of the general PHA email address on the Housing Authority Details page of IMS/PIC. This page is in the Housing Inventory module, Housing Agency submodule of IMS/PIC.

As a reminder, the general PHA email address is used for many types of HUD communications. In addition, it is the source of information for the report posted weekly to the PHA Contact Information web page at the link below. Members of the public use this site to find their local housing agency. https://www.hud.gov/program\_offices/public\_indian\_housing/pha/contacts

For instructions on updating the general PHA email address, see: https://www.hud.gov/sites/dfiles/PIH/documents/phacontactrpt\_email\_update\_pic.pdf

• *PHA Contacts:* Prior to the Transition Date, PHAs must ensure the accuracy of their PHA Contacts information in IMS/PIC. This information is located on the HA Contacts tab within the Housing Inventory module, Housing Agency submodule of IMS/PIC.

PHAs must ensure that, at a minimum, 1) the Executive Director, Board Chair, and local official (e.g., mayor, city manager) contact listings are accurate, including the phone number, email address, and mailing address, and 2) updates have been made for any other contacts listed, to reflect their proper roles, contact information, and status (Active/Inactive).

For instructions on updating PHA Contacts, see the "Maintaining HA Contacts" Job Aid, available on the IMS/PIC Job Aids page at <a href="https://www.hud.gov/program">https://www.hud.gov/program</a> offices/public indian housing/systems/pic/ts

PHAs will be required to maintain PHA contact information, including both PHA level information and PHA contacts, in the HIP system, so that HUD is able to contact PHAs and those individuals that work with a PHA (e.g., the use of executive director email addresses for sending out communications to PHAs).

## **Ensuring Accurate Building and Unit Data.**

The Building and Unit (B&U) data in IMS/PIC describes the PHA's physical Public Housing inventory. HUD reminds PHAs that the Building and Unit information is the basis for the calculation of Capital Fund grants and for the Project Expense Level (PEL) calculations for Operating Fund grants. To prevent improper payments, PHAs are required to ensure the accuracy of this information.

## 6.2.A. Building and Unit Data that Must be Validated Before the Transition Date.

In reviewing and updating their Building and Unit data, PHAs should prioritize the information in the bulleted list below. Further details on the requirements for validating each type of information and the process for doing so are available in Appendix B of this notice. HUD is highlighting these areas based on their potential impact on Capital Fund and Operating Fund calculations<sup>3</sup>; their impact on scoring PHAs under PHAS<sup>4</sup>; the extent to which HIP will rely on the information; and the level of difficulty of updating the information following migration to HIP.

Prioritized information that must be validated no later than two weeks prior to the Transition Date:

- Unit Counts: Validating the unit counts includes ensuring that 1) new units in projects
  that have reached the Date of Full Availability (DOFA) are recorded in developments
  with Actual DOFA Dates and 2) units removed from inventory have been properly
  recorded.
- Bedroom Counts
- Unit Designations<sup>5</sup>
- Accessible Designations<sup>6</sup>
- Unit Tenant Statuses<sup>7</sup>
- Dwelling Units, Non-Dwelling Units, Non-Dwelling Structures, Total Acres, and Total Removed Acres

HUD recommends that PHAs run a Unit Detail Report on the Reports tab and Unit Reports subtab of the IMS/PIC Housing Inventory module, Development submodule, to view key information on all Public Housing units in inventory. PHAs are further encouraged to securely retain this report in their records. Instructions for running a Unit Detail Report are available in

<sup>&</sup>lt;sup>3</sup> See 24 CFR 905.400

<sup>&</sup>lt;sup>4</sup> See PIH Notice 2024-03 and PIH-REAC Accounting Brief #17, available at: <a href="https://www.hud.gov/sites/documents/ACCTBRIEF17.PDF">https://www.hud.gov/sites/documents/ACCTBRIEF17.PDF</a>

<sup>&</sup>lt;sup>5</sup> See PIH Notice 2022-03.

<sup>&</sup>lt;sup>6</sup> Ibid

<sup>&</sup>lt;sup>7</sup> See PIH Notice 2024-03.

the "Unit Reports" Job Aid on the IMS/PIC Job Aids page at <a href="https://www.hud.gov/program\_offices/public\_indian\_housing/systems/pic/ts">https://www.hud.gov/program\_offices/public\_indian\_housing/systems/pic/ts</a>.

The Unit Detail Report will assist PHAs in verifying the number of ACC units as well as the Bedroom Counts, Unit Designations, and Accessible Designations. In addition, by checking the "Occupancy" checkbox when running the report, PHAs may include information on Unit Tenant Statuses and resident households to support further validations.

The Unit Detail Report will include the Unit Status Type for each unit within the PHA's inventory. PHAs must ensure that NO units have a Unit Status Type of "Status Changes Proposed", "Status Changes Submitted", "Status Changes being Reviewed", or "Proposed for Removed from Inventory" on the Transition Date. If a PHA has units in one of these Unit Status Types, it must work with the HUD field office to resolve these issues. HUD recommends doing so no later than two weeks prior to the Transition Date to ensure adequate time for HUD review.

#### 6.2.B. Requirement to Complete B&U Submission and Approval in IMS/PIC.

Following the completion of all updates to the Building and Unit information (see Section 6.2.A and Section 6.2.B), and no later than two weeks prior to the Transition Date, PHAs must submit their Building and Unit data for approval in IMS/PIC. To submit their Building and Unit data, PHAs will navigate to the Submission tab and Submit Unit Information sub-tab of the Development submodule in IMS/PIC.

This process submits the entire set of Building and Unit data; PHA users cannot choose specific developments. Because of this, users must ensure the data for all developments is complete and correct prior to initiating this process.

Upon submitting the building and unit data in IMS/PIC, PHA users should notify their HUD field office PIC Coach and provide any supporting documentation requested to verify the changes.

For instructions on this process, PHAs should refer to the information posted under the Housing Inventory module, Development sub module, on the IMS/PIC Job Aids page at <a href="https://www.hud.gov/program\_offices/public\_indian\_housing/systems/pic/ts">https://www.hud.gov/program\_offices/public\_indian\_housing/systems/pic/ts</a>.

#### 6.3. Ensuring Accurate Tenant Data.

The considerations and resources described below will assist MTW and non-MTW PHAs in ensuring that the active households listed in their internal records match those in IMS/PIC prior to the Transition Date.

#### **6.3.A.** Considerations in Tenant Data Migration.

HUD will migrate all current HUD-50058 and HUD-50058 MTW records from IMS/PIC to HIP as of the Transition Date. The "current record" is the latest record received and accepted for a

household. In addition, HUD will migrate a limited subset of historical HUD-50058 and HUD-50058 MTW records accepted by IMS/PIC. In future guidance, HUD will define the subset of historical records that will be migrated to HIP. Form HUD-50058 submissions that received fatal errors will not be migrated. PHAs should be aware of the following special considerations driven by the limitations of the data migration.

- Necessity of Correcting Historical Records: Prior to the Transition Date, PHAs should
  resolve issues with any historical records that may be outstanding. If a household is no
  longer in a PHA's software, the PHA can utilize the Online End of Participation (Online
  EOP) functionality to enter the effective date of the EOP and process the EOP online.
  The Online EOP functionality should only be used in these cases. EOPs that can be
  completed through the PHA's vendor software should be performed using that method.
- Error Reports Will Not Be Migrated: HUD will not migrate form HUD-50058 error reports from IMS/PIC to HIP. Therefore, PHAs will not have visibility on any fatal or warning errors received on past IMS/PIC submissions. PHAs should ensure that any fatal errors on error reports in IMS/PIC have been resolved prior to the Transition Date. PHAs with fatal errors that are not resolved in IMS/PIC will submit these form HUD-50058s in HIP as the original submissions. PHAs will <u>not</u> mark the Correction line on the form as "Yes" in these instances since they are not corrections of previously submitted and accepted forms.

## 6.3.B. Resources for Reconciling Tenant Data Prior to Transition Date.

This section provides guidance on a few key resources that PHAs may use in reconciling their tenant data prior to the Transition Date. PHAs should also use their existing processes and work with their software provider to ensure the tenant data in IMS/PIC is current and accurate prior to the Transition Date.

- *IMS/PIC 50058 Error Reports*: For HUD-50058 forms, PHAs can view the error reports for their submissions in the Form-50058 Submission submodule. For HUD-50058 MTW forms, MTW PHAs can view the error reports for their submissions in the MTW Data Collection submodule. PHAs can view the error reports for past submissions if they have made note of the ticket number for the submission. Checking the error reports after each submission file is submitted is important to ensure that any errors are caught and corrected in a timely manner. If an error report shows any fatal errors for a form, that form will not be recorded in the system as an official record for that household.
- PIC Error Dashboard: The PIC Error Dashboard shows a summary view of IMS/PIC fatal errors PHAs receive when inputting the form HUD-50058 information into IMS/PIC and form HUD-50058s with overdue reexaminations greater than fourteen months. Dashboard information is available for the Public Housing, HCV, and Mod Rehab programs, and for non-MTW, MTW, and Expansion MTW PHAs.

The information provided in the Dashboard (e.g., Form HUD-50058 Ticket Number, Form Number, and the data field containing the error) enables PHAs to look up additional details in IMS/PIC so that they may resolve issues. A link to the PIC Error

Dashboard, as well as training videos and materials, is available at: <a href="https://www.hud.gov/program\_offices/public\_indian\_housing/systems/pic/dashboard">https://www.hud.gov/program\_offices/public\_indian\_housing/systems/pic/dashboard</a>

• Errors Flagged in EIV: Many discrepancies flagged in EIV result from errors in form HUD-50058 submissions in IMS/PIC. For example, a simple data entry error in the Social Security number on a form HUD-50058 would prompt an EIV error and require correction in IMS/PIC. Other discrepancies flagged in EIV provide PHAs information they may have overlooked and may also require corrective action in IMS/PIC (e.g., the invalid flags returned by the Social Security Administration and described in PIH Notice 2018-24.)

For these reasons, in advance of the Transition Date, PHAs should review discrepancies in EIV; determine whether corrections to the tenant data are needed; and make the necessary corrections in IMS/PIC. Within their review, PHAs should include the Deceased Tenants Report; Identity Verification Report; Failed Effective Date Check Report (Overdue Reexams) in the Identity Verification Report; and Multiple Subsidy Report. Information on using these reports is described in PIH Notice 2018-18 and on the EIV web page at:

https://www.hud.gov/program\_offices/public\_indian\_housing/programs/ph/eiv

• *IMS/PIC Adhoc Report:* PHAs users may select the Form 50058 Adhoc Report or MTW Adhoc Report submodule within the Form 50058 module of IMS/PIC and follow the prompts to run a report providing tenant data by program type. The report functionality enables PHAs to generate separate reports for the Project-Based Voucher and Tenant-Based Voucher programs, Homeownership Vouchers, Mod Rehab (Single Room Occupancy (SRO) and non-SRO), and Public Housing. PHAs should compare these reports to internal records to completely reconcile their records with IMS/PIC data for all programs they administer.

In addition, PHAs should use the Form 50058 Adhoc Report or MTW Adhoc Report to reconcile their records with IMS/PIC for families participating in the FSS program. To do so, PHAs should run a Form 50058 Ad Hoc Report and select to include the information from Section 17 of the form HUD-50058. This step is necessary for PHAs that operate an FSS program as well as all PHAs with Tenant-Based Voucher programs (due to the requirements associated with portability.) Detailed instructions are available in Appendix 3 of PIH Notice 2016-08.

#### 6.4. Ensuring Data Accuracy for CY 2025 Operating Subsidy.

For Calendar Year (CY) 2025 Operating Fund grants, HUD anticipates pulling unit status data from IMS/PIC on or around August 1, 2024. This unit status data will cover the period from July 1, 2023, through June 30, 2024. HUD will pre-populate this information on the form HUD-

<sup>&</sup>lt;sup>8</sup> Guidance on timely reporting in PIH Notice 2011-65 requires PHAs to submit forms HUD-50058 and HUD-50058 MTW within 60 days of the effective date of any actions. However, HUD typically pulls unit status data to prepopulate Operating Subsidy forms from IMS/PIC 30 days after the end of the reporting period to prepopulate the form HUD-52723. Annual Operating Subsidy processing guidance requires PHAs to have all form HUD-50058

52723 to calculate each PHA's Operating Subsidy eligibility. PHAs can support funding accuracy by following the guidance above in Sections 6.2 and 6.3 of this notice, including the requirement to ensure that all units are in the correct Unit Tenant Status in IMS/PIC based on the requirements and definitions in PIH Notice 2024-03 (Section 6.2.A.). PHAs should also ensure that they timely transmit all form HUD-50058s to IMS/PIC that are effective during the Operating Fund reporting period, in accordance with guidance from HUD's Financial Management Division (FMD).

## 7. Considerations for PHAs Based on Program Type and Status

Certain guidance applies only to PHAs that operate HCV programs. Other guidance applies only to PHAs that participate in the MTW Demonstration, that are in the process of closing out their Public Housing program, or that are undertaking other repositioning activities. The subsections within this section offer tailored guidance to these subsets of PHAs.

## 7.1. Considerations for PHAs Administering HCV Programs.

To support the transition to HIP and avoid additional disruptions, HUD is announcing an adjustment in the onboarding of additional PHAs to eVMS. In the fall of 2023, HUD onboarded the first 101 HCV PHAs into eVMS. HUD anticipated onboarding three additional waves starting in the Spring of 2024 and completing the transition of all PHAs to eVMS by the end of CY 2024. However, HUD has decided to adjust the rollout of eVMS. PHAs included in the first wave will receive additional instructions from HUD that are specific to them. HUD will post a revised roll-out schedule to the eVMS web page at the link below, reflecting an adjustment in onboarding additional waves of PHAs until after the HIP Opening Date. https://www.hud.gov/program\_offices/public\_indian\_housing/programs/hcv/eVMS

## 7.2. Considerations for MTW PHAs.

The Initial 39 MTW PHAs will continue submitting tenant data using the form HUD-50058 MTW until they transition to the 2024 version of the form HUD-50058 MTW for actions effective on or after January 1, 2025.

Expansion MTW PHAs should begin using the 2020 version of the HUD-50058 MTW Expansion on the HIP Opening Date, and transition to the 2024 version of the form HUD-50058 MTW Expansion for actions effective on or after January 1, 2025. Expansion MTW PHAs should NOT use the form HUD-50058 MTW, which applies only to the Initial 39 MTW PHAs.

Some Expansion MTW PHAs have been holding forms because they could not submit them in IMS/PIC. These PHAs implemented HUD-approved MTW flexibilities that fell outside the established validation criteria, and the form submissions would therefore trigger fatal errors in IMS/PIC. Expansion MTW PHAs that have been instructed to hold their HUD-50058 submissions until HIP implementation should continue to do so. Beginning with the HIP

submissions for the Operating Subsidy reporting period (July 1<sup>st</sup> of the prior year to June 30<sup>th</sup> of the current year) complete by July 30<sup>th</sup> of the current year. For the CY 2024 Operating Subsidy Processing Notice, see PIH Notice 2023-25. Guidance for CY 2025 is forthcoming. PHAs must follow the more stringent requirement.

Opening Date, impacted Expansion MTW PHAs should submit their backlog of form 50058s sequentially in the order of their effective date from oldest to newest. HIP will allow HUD to use most of the same validations for the HUD-50058 and HUD-50058 MTW Expansion and relax validations from fatal errors to warning errors to allow for the implementation of MTW flexibilities.

## 7.3. Considerations for PHAs Closing Out Their Public Housing Programs.

PHAs closing out their Public Housing programs may do so through ACC termination and PHA closeout (see PIH Notice 2019-13) or through a voluntary transfer or consolidation of their Public Housing program (see PIH Notice 2014-24).

PHAs that no longer have any Public Housing ACC units as of the date of issuance of this notice and intend to close out their Public Housing program must take the following actions, as appropriate:

• If the PHA is closing out its Public Housing program through ACC termination, it must work with the local field office to complete the close-out process. Upon receipt of the signed public housing ACC termination letter, HUD's Real Estate Assessment Center (REAC) will either change the PHA's status to Inactive or change the program type to Section 8-only, as applicable. PHAs recorded as "Inactive" in IMS/PIC as of the Transition Date will not be migrated into HIP.

PHAs intending to receive funding to be used for eligible close-out expenses should NOT terminate their ACC and will NOT be made inactive in HUD systems. <sup>9</sup> If the ACC is terminated, the PHA is ineligible for Operating Funds and Capital Funds. A PHA should not terminate its ACC if it has the need for close-out funds.

• If the PHA is closing out its Public Housing program through a voluntary transfer or consolidation AND the HUD-approved effective date of the transfer or consolidation precedes the Transition Date, it must work with the local field office to complete the transfer/consolidation in IMS/PIC prior to the Transition Date. Upon receipt of the signed approval letter, REAC will process the transfer or consolidation in IMS/PIC. On the Transition Date, the Public Housing units should be displayed under the receiving PHA in IMS/PIC, and the divesting PHA should be recorded either as "Inactive" or with a Section-8 only program type, as applicable.

Regardless of the method of closing out their Public Housing program, PHAs that will become inactive in IMS/PIC must ensure that EIV access has been removed from all users and that the users have been made inactive in IMS/PIC.

No actions are required of PHAs that no longer have any Public Housing ACC units as of the date of issuance but have (a) submitted a Notification of Public Housing Closeout or Future

 $\underline{https://www.hud.gov/sites/dfiles/PIH/documents/ph\_funds\_repositioning.pdf}$ 

<sup>&</sup>lt;sup>9</sup> For further information on eligible Public Housing program costs for PHAs with no remaining Public Housing units, see FAQ #5 (pg. 3) of this document:

Development (Form HUD-5837) indicating their intention to build back additional Public Housing units, or (b) are closing out through a transfer or consolidation, for which the effective date is after the Transition Date.

## 7.4. Considerations for PHAs Submitting Inventory Removal Applications.

PHAs currently submit the form HUD-52860 Inventory Removals Application and supporting documents through the Inventory Removals submodule within the Housing Inventory module of IMS/PIC. HUD will not accept any application submissions in IMS/PIC after July 1, 2024. PHAs preparing to submit inventory removal applications under Sections 18, 22, 32, or 33 of the U.S. Housing Act of 1937 (as amended), Eminent Domain, or retention of Public Housing property under 2 CFR 200.311(c)(1) ("Part 200") should make every effort to do so on or before July 1, 2024.

HUD will migrate all inventory removal applications and documents from IMS/PIC to HIP. PHAs may access these existing applications in HIP and will have the ability to create and submit new inventory removal applications in HIP. Further guidance will be provided in a forthcoming supplemental notice.

PHAs with a need to submit an inventory removal application during the period between July 2, 2024, and the HIP Opening Date should consult with their local field office. If the PHA can demonstrate an urgent need (e.g., health and safety hazard to residents), the agency will be permitted to submit the form HUD-52860 and supporting documents via email to <a href="mailto:sacta@hud.gov">SACTA@hud.gov</a>. Inventory removal application inquiries related to the Rental Assistance Demonstration should also be directed to <a href="mailto:sacta@hud.gov">SACTA@hud.gov</a>.

#### 8. Guidance on Actions PHAs Should Take During the Transition Period.

During the Transition Period (i.e., following the Transition Date and in advance of the HIP Opening Date), PHAs must continue to conduct routine operations, document their actions, lease to new participants (as applicable), securely maintain their records, and prepare to transmit form HUD-50058 information to HIP within the later of 60 calendar days of the effective date of any action or 60 calendar days from the HIP Opening Date, unless a more stringent requirement applies. Further, PHAs must continue to furnish records and information to their local HUD field office in accordance with the ACC and must follow the prescribed process to notify HUD of changes to their general PHA email address and key contacts (i.e., Executive Director, Board Chair, local official.).

In addition, to facilitate a smooth transition to HIP and compliance with HOTMA, HUD encourages PHAs to take the following steps during this period:

 Confirm readiness of software vendor. PHAs that use a software vendor for their form HUD-50058 submissions should confirm that their software vendor will support HIP, including transmission of the 2020 versions of the form HUD-50058 by the HIP Opening Date and transmission of the 2024 versions of the form HUD-50058 on January 1, 2025. PHAs that do not use a software vendor will have the ability to electronically submit the 2020 version of the form HUD-50058 through the Fillable 50058 as of the HIP Opening Date, and to submit the 2024 version of the form HUD-50058 via the Fillable 50058 on January 1, 2025.

- Plan for HOTMA compliance. To comply with Sections 102 and 104 of HOTMA, PHAs must use 2024 versions of the form HUD-50058 for all actions effective on or after 1/1/2025.
- Update administrative policies and procedures for the transmission of data to HUD. PHAs should have policies and procedures detailing staff roles and responsibilities for maintaining accurate PHA contact information and building and unit data in HUD systems and transmitting tenant information to HUD systems. These policies and procedures will need to be updated based on the implementation of HIP. Among other updates, PHAs are encouraged to:
  - Review and update procedures regarding security administration (i.e., adding and deactivating users in HIP and assigning permissions). In doing so, PHAs should anticipate that HUD will set up between one and two security administrators per PHA. These PHA administrators will then be responsible for approving or rejecting requests for access from PHA staff and assigning the permission set(s) each user needs.
  - Review and update procedures regarding submission of form HUD-50058s, including staff roles authorized to submit; procedures for review and approval; and procedures for checking error reports and making corrections.

PHAs may have processes and procedures regarding the use of certain reports in the Form-50058 module of IMS/PIC or rely on the centralized information provided by the PIC Error Dashboard. These PHAs should update their processes to rely on the capabilities provided by HIP and their vendor software.

HUD encourages PHAs to establish policies and procedures to submit form HUD-50058s more frequently than the maximum allowable timeframe of 60 days from the effective date. The frequency of reporting has important implications for the currency of the data in EIV and other systems, and PHAs may find it advantageous to submit more frequently. While IMS/PIC performed a monthly summarization, this practice is not being implemented in HIP. HUD discourages PHAs from waiting until the end of the month to transmit form HUD-50058s and from delaying the submission of End of Participation and Portability Move-Out records.

PHAs operating HCV programs should also consider the roll-out of eVMS. The eVMS will automatically calculate HAP disbursements using the family-level data that PHAs submit to HUD via the form HUD-50058. The timing of form HUD-50058 submissions accepted in HIP may impact whether the submission will be captured in the next month's HAP disbursements calculated by eVMS. PHAs may visit the eVMS

# 9. Guidance on Actions PHAs Should Take Following the HIP Opening Date.

Beginning with the HIP Opening Date, PHAs will submit and maintain tenant data, Public Housing inventory data, and PHA contact information exclusively in HIP. PHA users should:

- Confirm access to HIP. PHA users should follow the instructions that will be posted to the HIP web page to gain access to the HIP system and should work with their PHA security administrator(s) to ensure they receive the appropriate permission set(s) in HIP according to the data they need to access to perform their job duties.
- Ensure success of data migration. The PHA should review the data in HIP to confirm that it aligns with the data in their internal records, as validated in IMS/PIC prior to the Transition Date.
- Timely submit form HUD-50058s. No later than 60 calendar days after the Opening Date, PHAs must submit all form HUD-50058s effective prior to the Opening Date. PHAs should also submit any necessary corrections to forms that were submitted in IMS/PIC and migrated to HIP. PHAs that need to submit multiple form HUD-50058 records for a single household will need to submit these sequentially in the order of their effective date from oldest to newest.

PHAs that operate a Tenant-Based Voucher program and are submitting records for eligible families that exercised portability<sup>10</sup> to move between jurisdictions should coordinate with the other PHA on the timing of submissions (e.g., to ensure that the Initial PHA submits a Portability Move-Out in HIP before the Receiving PHA attempts to submit a Portability Move-In in HIP.)

PHAs must use the appropriate version of the form HUD-50058 (HUD-50058, HUD-50058 MTW, HUD-50058 MTW Expansion) based on the type of PHA. All transactions effective on or after January 1, 2025, should be submitted using the 2024 version of the HUD-50058.

Comply with HUD and PHA processes and policies. Ensure compliance with HUD reporting requirements and PHA policies and procedures, including those related to timely reporting and administrative policies and procedures for the transmission of data to HUD. PHAs are reminded that they PHAs must submit the 2024 versions of the form HUD-50058 to HIP no later than March 2, 2025, for actions effective on January 1, 2025, and must be fully compliant with HOTMA on January 1, 2025.

<sup>&</sup>lt;sup>10</sup> See 24 CFR 982.353 through 982.355; PIH Notice 2016-09; and the "Portability and Moves" chapter of the HCV Guidebook available at: <a href="https://www.hud.gov/program\_offices/public\_indian\_housing/programs/hcv/guidebook">https://www.hud.gov/program\_offices/public\_indian\_housing/programs/hcv/guidebook</a>

### 10. Requirements for Software Vendors.

Software vendors that wish to interface with HIP, including PHAs that build and support their own custom software to interface with HIP, must adapt their software to electronically submit data required by the 2020 and 2024 versions of the form HUD-50058 and to utilize the file format supported by HIP for transmitting this data to HUD. Vendors, including PHAs that build their own custom software, must also execute an Interconnection Security Agreement and Memorandum of Understanding/Agreement (ISA/MOU) with HUD before they can begin exchanging data through HIP.

Software vendors should visit the HIP Technical Information web page for detailed specifications and information on participating in ongoing testing of HIP. <a href="https://www.hud.gov/program\_offices/public\_indian\_housing/hip/techinfo">https://www.hud.gov/program\_offices/public\_indian\_housing/hip/techinfo</a>

#### 11. Paperwork Reduction Act.

The information collection requirements contained in this Notice have been approved by the Office of Management and Budget (OMB) under the Paperwork Reduction Act of 1995 (44 U.S.C. 3501-3520) and assigned OMB control numbers 2577-0075<sup>11</sup>, 2577-0083<sup>12</sup>, 2577-0169<sup>13</sup>, 2577-0178<sup>14</sup>, 2577-0226<sup>15</sup>, 2577-0296<sup>16</sup>. In accordance with the Paperwork Reduction Act, HUD may not conduct or sponsor, and a person is not required to respond to, a collection of information unless the collection displays a currently valid OMB control number.

# 12. <u>Further Information</u>.

PHAs, residents, and members of the public with general questions regarding PIH programs, should contact their local field office. Contact information for local field offices is available at: <a href="https://www.hud.gov/program\_offices/public\_indian\_housing/about/focontacts">https://www.hud.gov/program\_offices/public\_indian\_housing/about/focontacts</a>

Software vendors, including PHAs that build their own 50058 software, may contact <a href="https://www.hud.gov/program\_offices/public\_indian\_housing/hip/techinfo">https://www.hud.gov/program\_offices/public\_indian\_housing/hip/techinfo</a>

Questions regarding the HIP system or this notice from individuals other than software vendors may be directed to <a href="https://example.com/PIH\_HIP@hud.gov">PIH\_HIP@hud.gov</a>. The HIP Team will post responses to frequently asked

<sup>&</sup>lt;sup>11</sup> OMB Control Number 2577-0075, Inventory Removal Application Forms, Expiration date: 4/30/2024, 84 FR 60410

<sup>&</sup>lt;sup>12</sup> OMB Control Number 2577-0083, Family Report, MTW Family Report, MTW Expansion Family Report, Expiration date: 9/30/2026, 88 FR 37260.

<sup>&</sup>lt;sup>13</sup> OMB Control Number 2577-0169, Housing Choice Voucher (HCV) Program and Tribal HUD-VASH, Expiration date: 4/30/2026, 88 FR 2959.

<sup>&</sup>lt;sup>14</sup> OMB Control Number 2577-0178, Family Self-Sufficiency Program (FSS), Expiration date: 4/30/2025, 85 FR 71085.

OMB Control Number 2577-0226, Public Housing Agency Plan, Expiration date: 3/31/2024, 84 FR 58167. This approved information collection covers the MTW Supplement to the Annual PHA Plan (HUD-50075-MTW).
 OMB Control Number 2577-0296, Project Based Voucher (PBV) Online Form, Expiration date: 4/30/2027, 88 FR 60249.

questions, as well as other resources, on the HIP web page at: <a href="https://www.hud.gov/program\_offices/public\_indian\_housing/hip">https://www.hud.gov/program\_offices/public\_indian\_housing/hip</a>

The REAC Technical Assistance Center (TAC) will continue to be available to provide systems support for HIP. PHAs may contact the TAC via phone (1-888-245-4860) or email (REAC\_TAC@hud.gov) and should mention the module of HIP in which the issue is occurring. Please do not refer to HIP as "Salesforce" since HUD has multiple applications in Salesforce. Further information is available at:

https://www.hud.gov/program\_offices/public\_indian\_housing/reac/support/tac

Questions regarding HOTMA compliance may directed to <a href="https://www.hud.gov/program\_offices/public\_indian\_housing/hotmaresources">HOTMA Resources web page at: <a href="https://www.hud.gov/program\_offices/public\_indian\_housing/hotmaresources">https://www.hud.gov/program\_offices/public\_indian\_housing/hotmaresources</a>

HUD welcomes and is prepared to receive calls from individuals who are deaf or hard of hearing, as well as individuals with speech or communication disabilities. To learn more about how to make an accessible telephone call, please visit:

https://www.fcc.gov/consumers/guides/telecommunications-relay-service-trs

Richard J. Monocchio

Principal Deputy Assistant Secretary for Public and Indian Housing

Rubant J. Monorchio

APPENDIX A: Quick Reference Guide for Ensuring Building and Unit Data Accuracy

IMS/PIC Module	IMS/PIC Submodule	Data Element	Requirement	Applies to:
Housing Inventory	Housing Agency	PHA General Email Address	Ensure the general PHA email address is accurate.	All PHAs
Housing Inventory	Housing Agency	PHA Details	Ensure accurate mailing address, physical address, phone number.	All PHAs
Housing Inventory	Housing Agency	HA Contacts	Ensure accurate name, role, email, and address for Executive Director, Board Chair, and local official, at a minimum. Ensure any other contacts listed are updated.	All PHAs
Housing Inventory	Development	ACC Unit Count	Ensure accurate unit count, including properly reflecting new units and removals.	PH-Only and Combined PHAs
Housing Inventory	Development	Bedroom Counts	Ensure Bedroom Count is accurate for all units.	PH-Only and Combined PHAs
Housing Inventory	Development	Unit Designations	Ensure Unit Designation is accurate for all units.	PH-Only and Combined PHAs
Housing Inventory	Development	Accessible Designations	Ensure Accessible Designation is accurate for all units.	PH-Only and Combined PHAs
Housing Inventory	Development	Unit Tenant Statuses	Ensure Unit Tenant Status is accurate for all units, and no changes pending.	PH-Only and Combined PHAs
Housing Inventory	Development	Dwelling Units, Non-Dwelling Units, Non- Dwelling Structures, and Vacant Land	Ensure that all Public Housing property is recorded under an IMS/PIC development number.	PH-Only and Combined PHAs
Housing Inventory	Development	Submit Building and Unit data for Approval	Following all corrections in the Development submodule, submit the Building and Unit data for approval.	PH-Only and Combined PHAs
Form 50058	Submission – Upload	Submit Tenant Data	Transmit all 50058s to IMS/PIC that are effective.	All PHAs
Form 50058	Submission  – Reports	Address Errors	Review and address any errors received.	All PHAs
Form 50058	Submission  – Reports	Address Errors	Clear any errors displayed on prior form HUD-50058 submissions.	All PHAs

IMS/PIC	IMS/PIC	Data Element	Requirement	Applies to:
Module	Submodule			
Adhoc	Form 50058	Reconcile Data for	Compare internal records to an	All PHAs
	Adhoc	All Programs	IMS/PIC Ad Hoc report and	
	Report or		reconcile any discrepancies,	
	MTW Adhoc		including discrepancies in	
	Report		records of households	
			participating in the FSS	
			program.	

# APPENDIX B: Supplemental Information on Building and Unit Data that MUST be Validated BEFORE the Transition Date.

Per Section 6.2.A., through the Unit Detail Report or other reports and displays available in IMS/PIC, PHAs must verify the following no later than two weeks prior to the Transition Date:

#### • ACC Unit Count:

The current form of the ACC no longer contains a count of dwelling units. Except for units added as part of mixed-finance development, HUD no longer requires a "unit change" amendment to the ACC to reflect HUD approved removals and additions of dwelling units. Instead, the unit count in IMS/PIC, HIP, or successor systems is deemed to be the unit count under the PHA's ACC. Therefore, PHAs must ensure that removals and additions of units are accurately recorded in IMS/PIC prior to the Transition Date. In particular, PHAs must ensure that:

- ➤ New units in projects that have reached the Date of Full Availability (DOFA)<sup>17</sup> are recorded in developments with Actual DOFA Dates. These units will typically have a Unit Status Type of "Initial Approval Completed" in the Unit Detail Report.
- ➤ Units removed from inventory have been properly recorded in IMS/PIC. These units will have a Unit Status Type of "Removed from Inventory" or "Removed without HUD formal approval"; PHAs will need to change the default in the Unit Status drop-down box when running the Unit Detail Report to view these units. If a PHA has units that are "Proposed for Removed from Inventory" (i.e., the PHA has submitted the removal date in IMS/PIC and it is pending review), it must work with the HUD field office to ensure HUD review and approval or rejection of the removal transaction.

#### Bedroom Counts

PHAs must ensure that each dwelling unit listed in IMS/PIC has an accurate bedroom count. PHAs may view the bedroom counts for each unit within the Unit Detail Report. PHA users may follow the instructions at the link below to update bedroom counts. However, PHAs will need to request assistance from their HUD field office if bedroom counts need to be updated for units in a status of "DemoDispo - Draft", "DemoDispo - Proposed", or "DemoDispo - Approved".

https://www.hud.gov/program\_offices/public\_indian\_housing/systems/pic/bu/bedrmcount

<sup>&</sup>lt;sup>17</sup> The Date of Full Availability (DOFA) is defined at 24 CFR 905.108 as "The last day of the month in which substantially all (95 percent or more) of the units in a public housing project are available for occupancy."

### • *Unit Designations*

PHAs must ensure that the Unit Designation is accurate in IMS/PIC for all units. Unit Designations reflect whether a unit is available to any family type; is reserved for occupancy by elderly and/or disabled families exclusively; is used for non-dwelling purposes; or has been merged into another unit. Certain Unit Designation Categories require a HUD-approved Designated Housing Plan (DHP).

PHAs should refer to the requirements and definitions in PIH Notice 2022-03. To update Unit Designations, PHA users may refer to the instructions in Section 6.1 of the notice or the "Unit Designation and Accessible Designation Changes" Job Aid on the IMS/PIC Job Aids page at

https://www.hud.gov/program\_offices/public\_indian\_housing/systems/pic/ts.

PHAs must ensure that any Unit Designation changes they have proposed in IMS/PIC are submitted to the field office and approved or rejected prior to the Transition Date.

#### • Accessible Designations

PHAs must ensure that the Accessible Designation is accurate in IMS/PIC for all units. Accessible Designations reflect the physical characteristics of Public Housing units available to accommodate individuals with disabilities.

PHAs should refer to the requirements and definitions in PIH Notice 2022-03. To update Accessible Designations, PHA users may refer to the instructions in Section 6.2 of the notice or the "Unit Designation and Accessible Designation Changes" Job Aid on the IMS/PIC Job Aids page at

https://www.hud.gov/program\_offices/public\_indian\_housing/systems/pic/ts.

PHAs must ensure that any Accessible Designation changes they have proposed in IMS/PIC are submitted to the field office and approved or rejected prior to the Transition Date.

#### • Unit Tenant Statuses

Dwelling units are categorized by Unit Tenant Status Categories (Occupied, Vacant, Vacant HUD-Approved, Non-Dwelling) and Sub-Categories (e.g. Assisted Tenant, Police Officer).

PHAs must ensure that all units are in the correct Unit Tenant Status in IMS/PIC based on the requirements and definitions in PIH Notice 2024-03. In particular, PHAs must ensure that:

➤ All form HUD-50058s occupying and vacating units (i.e., New Admission, Other Change of Unit, or End of Participation records) have been transmitted to IMS/PIC and accepted by the system.

- ➤ The PHA has an approval letter for all units in HUD-Approved Unit Tenant Statuses; the units continue to meet the requirements for the HUD-Approved Sub-Category; and the expiration date of the approval does not precede the Transition Date.
- ➤ The PHA has no pending Unit Tenant Status Change requests in IMS/PIC. PHAs must work with the HUD field office to ensure HUD approval or rejection of any pending Unit Tenant Status Change requests prior to the Transition Date.

To update Unit Tenant Statuses, PHA users should refer to the instructions in the "Unit Tenant Status Changes" Job Aid on the IMS/PIC Job Aids page at <a href="https://www.hud.gov/program\_offices/public\_indian\_housing/systems/pic/ts">https://www.hud.gov/program\_offices/public\_indian\_housing/systems/pic/ts</a>.

• Dwelling Units, Non-Dwelling Units, Non-Dwelling Structures, and Vacant Land

PHAs must ensure that all Public Housing property (including dwelling units; dwelling units used for non-dwelling purposes; non-dwelling buildings; and land, including vacant land) is recorded in IMS/PIC prior to the Transition Date.

- ➤ <u>Dwelling Units</u>: Dwelling units under an ACC are addressed above. In addition, PHAs must record non-ACC units in IMS/PIC if they are included within a Public Housing development. This typically applies to "floating units" within a mixed-finance development.
- ➤ <u>Dwelling Units Used for Non-Dwelling Purposes (Non-Dwelling Units)</u>: PIH Notice 2024-03 defines non-dwelling units as "public housing dwelling units that a PHA may use for special purposes other than housing an eligible, low-income family." Examples include dwelling units temporarily used for Administrative Uses (e.g., PHA office space) or Resident Amenities (e.g., laundry rooms).

Non-Dwelling units will appear in the Unit Detail Report with a Unit Designation of "Non-Dwelling". PHAs that identify non-dwelling units that are not recorded in IMS/PIC should contact their HUD field office.

Non-Dwelling Buildings/Structures: Under the National Standards for the Physical Inspection of Real Estate (NSPIRE), REAC defines a building as "Any structure that has a contiguous roofline, has a permanent foundation (including pier foundations poured to bearing soil and below the frost line), is enclosed on all sides, and has at least one utility servicing it such as electric, gas, water, or sewer." Buildings that meet this definition must be recorded in IMS/PIC prior to the Transition Date. Examples may include storage sheds, maintenance shops, administrative buildings, and community buildings.

<sup>&</sup>lt;sup>18</sup> See NSPIRE Terms and Definitions webpage, available at: <a href="https://www.hud.gov/program\_offices/public\_indian\_housing/reac/nspire/terms-and-definitions">https://www.hud.gov/program\_offices/public\_indian\_housing/reac/nspire/terms-and-definitions</a>

HUD recommends that PHAs run a Building Report on the Reports tab and Building Reports sub-tab of the IMS/PIC Housing Inventory module, Development submodule, to view information on all Non-Dwelling Buildings/Structures in inventory. Instructions for running this report are available in the "Building Reports" Job Aid on the IMS/PIC Job Aids page at <a href="https://www.hud.gov/program">https://www.hud.gov/program</a> offices/public indian housing/systems/pic/ts.

PHAs can provide their HUD field office the information needed to add a Non-Dwelling Structure to IMS/PIC by either completing the "Data Collection Template for Adding Non-dwelling Buildings that are Missing in IMS-PIC" template at the link below or including all of the information from the template in an email to their field office.

https://www.hud.gov/program\_offices/public\_indian\_housing/systems/pic/ts

Land: The "Total Acres" field on the Development Profile page in IMS/PIC must reflect the land included within the Public Housing project. Vacant land purchased or maintained with Public Housing funds must be included in IMS/PIC and may be reflected under its own development number.