



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 2024-42**

**Issued:** December 31, 2024

**Expires:** This Notice remains in effect until amended, superseded, or rescinded

**Cross References:** 24 CFR Part 960, 24 CFR Part 990

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Subject: Best Practice Guidance to Achieve Optimal Occupancy in Public Housing

**1. Purpose.**

As the need for affordable housing grows, the supply of existing public housing remains critical to reducing homelessness and increasing economic mobility for low to moderate-income families. This guidance provides Public Housing Agencies (PHAs) administering a Public Housing Program with strategies for improving and maintaining an optimal Public Housing (PH) occupancy rate.

**2. Background.**

This notice underscores the significance of reducing vacancies in public housing and highlights successful strategies from PHAs across the country, despite many challenges in achieving maximum occupancy rates. Administrative processes, technology challenges, and addressing community needs can be time-consuming, especially for smaller PHAs with limited staff. However, streamlining these procedures without compromising regulatory compliance has proved essential to expediting the transition from vacancy to occupancy efficiently.

HUD collaborated with PHAs across all networks that achieved or maintained HUD's annual Management Assessment Subsystem (MASS) occupancy rate of 95.5 percent during Federal Fiscal Year 2023 to identify successful strategies. The collaborative discussions provided effective strategies, resources, and tools for increasing the occupancy of Public Housing units and maximizing the PHAs' capacity to serve more families.<sup>1</sup>

The Department aims to maximize the reach of rental assistance programs by increasing the occupancy rate in the Public Housing program. The strategies discussed in this Notice

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<sup>1</sup> Some of the strategies identified reflect PHAs' efforts to streamline and enhance program delivery as a result of meeting the operational and occupancy challenges brought about by the COVID-19 pandemic.

support approaches for improving rental assistance, help the PHA achieve occupancy goals, and provide solutions to some challenges and barriers the PHA might encounter in maintaining maximum occupancy.

### **3. Applicability.**

This notice applies to PHAs administering the Public Housing program, including PHAs that participate in the Moving to Work (MTW) Demonstration.

### **4. Strategies for Reducing the Number of Vacant Units.**

HUD recognizes that there are numerous factors not directly within a PHA's control that may directly affect their ability to maintain optimal occupancy (e.g., supply chain issues, staff attrition, neighborhood amenities) within their programs. Additionally, PHAs administering a small (e.g., fewer than 250 units) Public Housing program might encounter greater challenges maintaining optimal occupancy rates. For example, a few unoccupied units may decrease the occupancy rate of a small agency beneath an optimal level. Housing authorities are encouraged to take proactive measures to address vacancies by thoroughly evaluating occupancy data and engaging in discussions with property staff and residents. This comprehensive approach enables them to identify and understand the underlying factors driving or contributing to vacancies, facilitating informed decision-making and targeted interventions to improve occupancy rates and support community needs.

Proven strategies for reducing vacancy rates and ensuring a more stable, affordable housing environment include, but are not limited to:

**A. Waiting List Management:** Given the high demand, PHAs nationwide often contend with extensive waiting lists. This situation can lead to applicants losing interest or seeking alternative housing solutions. Conversely, some PHAs face challenges in finding eligible applicants to occupy vacant public housing units, potentially causing the occupancy rate to fall below an optimal level. Therefore, implementing effective waitlist management strategies is crucial. These strategies can help streamline the application and selection process, prioritize applicants based on need, and ensure that available housing units are efficiently filled. By proactively managing waitlists, PHAs can better address housing needs within their communities and optimize occupancy rates.

An essential strategy that some PHAs employed to address these challenges is developing and regularly updating the waiting list and tenant selection policies in the Admissions and Continued Occupancy Policy (ACOP).<sup>2</sup> Additionally, PHAs must establish policies that describe the circumstances under which applicants will be removed from the waiting list.<sup>3</sup> For instance, PHAs implemented policies that resulted in updating existing waiting lists by removing families who were unresponsive or no longer interested in a public housing

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<sup>2</sup> Section 103 of the Housing Opportunity Through Modernization Act (HOTMA) of 2016 mandates PHAs annually report the total number of families on their waiting list(s) in the Public Housing Portal.

<sup>3</sup> Waiting List and Tenant Selection, Public Housing Occupancy Guidebook, available at [https://www.hud.gov/sites/dfiles/PIH/documents/PHOG\\_Waiting\\_List\\_Chapter.pdf](https://www.hud.gov/sites/dfiles/PIH/documents/PHOG_Waiting_List_Chapter.pdf)

unit. Also, PHAs have used preferences to establish the order of applicants on the waiting lists like preferences for families experiencing homelessness and persons with disabilities. PHAs must describe the system of local preferences in their ACOP, and the preferences must be consistent with the PHA's Annual Plan and the Consolidated Plan under which the local PHA jurisdiction is covered.<sup>4</sup> For more guidance on ensuring their agency includes mandatory and discretionary policies, refer to the Public Housing Occupancy Guidebook chapter on Waiting List and Tenant Selection.<sup>5</sup>

Establishing and updating (as needed) the waiting list to meet community needs may include but is not limited to the following:

- i.** Identify and operate well-organized community-wide and/or site-based waiting list(s) (SBWL).<sup>6</sup> Implementing a SBWL requires the consideration of five conditions, (1) accurate, complete, and timely submission of tenant characteristics data, (2) full disclosure to the applicant concerning the selection of a development, (3) the SBWL does not violate any court order or settlement agreement or be inconsistent with a pending HUD compliant, (4) SBWLs is consistent with affirmatively furthering fair housing, and (5) the PHA prepares for a review of the SBWL policy for consistency with civil rights laws and certifications.<sup>7</sup> PHAs have incorporated site-based waiting lists into their marketing and outreach strategies as a way of providing future tenants with the option to select their preferred place of residency.
- ii.** Furthermore, PHAs may want to consider implementing a centralized waiting list system with a reputable technology vendor, which involves collaboration among all participating PHAs within a specific state or region within a state. This approach aims to streamline the application process by automatically enrolling applicants on the waiting lists of all participating PHAs in that state or region.
- iii.** Schedule regular waiting list updates (i.e., purges). PHAs regularly schedule waiting list purges every one to two years, which helps with maintaining an updated list of applicants' contact information. This strategy has lessened PHAs' administrative burden causing a decrease in the length of their waiting lists and a reduction in the time allocated towards the tenant selection process.
- iv.** Determine indicators that trigger a PHA to open or close the waiting list(s). For example, PHAs may establish thresholds for when the number of applicants per bedroom type and development drops below or reach a specific number. These identified thresholds should trigger the reopening or closing of a waiting list.

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<sup>4</sup> 24 CFR 960.206(a)(1)

<sup>5</sup> Waiting List and Tenant Selection, Public Housing Occupancy Guidebook, available at [https://www.hud.gov/sites/dfiles/PIH/documents/PHOG\\_Waiting\\_List\\_Chapter.pdf](https://www.hud.gov/sites/dfiles/PIH/documents/PHOG_Waiting_List_Chapter.pdf)

<sup>6</sup> 24 CFR 903

<sup>7</sup> Waiting List and Tenant Selection, Public Housing Occupancy Guidebook, available at [https://www.hud.gov/sites/dfiles/PIH/documents/PHOG\\_Waiting\\_List\\_Chapter.pdf](https://www.hud.gov/sites/dfiles/PIH/documents/PHOG_Waiting_List_Chapter.pdf)

- v. PHAs must consider how long to keep the waiting list open (e.g., 30 days) to ensure applicants have a significant opportunity to apply.<sup>8</sup> While some PHAs close their waiting list after a specific period, others maintain permanently open lists and accept applications indefinitely to ensure timely filling of vacant units. PHAs are therefore encouraged to offer various application methods, like online or in-person, to accommodate all applicants.
- vi. PHAs may select preferences that address the local housing needs such as residency, working family, homeless and veteran preferences. PHAs may continue to look for alternative approaches for addressing its local community needs by leveraging resources and actively seeking opportunities to collaborate with community partners. For instance, some PHAs partner with their local Continuum of Care (CoC) Agency to effectively connect people to interventions that will rapidly end their homelessness through a coordinated entry process.<sup>9</sup> PHAs also share data from the IMS/PIC or its successor system and the Homeless Management Information System (HMIS) to inform policies for individuals and families experiencing or at risk of homelessness. This approach has been an effective strategy adopted by some PHAs for marketing to specific individuals and families.
- vii. Implementing an efficient pre-screening process, coupled with regular updates on waitlist status and transparent communication regarding changes in the application process, ensures timely placement and alignment of prospective tenants with suitable housing units, while also expediting the selection process and maintaining compliance with Fair Housing requirements. For instance, PHAs should keep applicants informed about their status on the waitlist and any changes in the application process.

**B. Establishing Unit Turnaround Protocol:** Establishing comprehensive unit turnover protocols is critical for maintaining high standards in property management and ensuring resident satisfaction. PHAs are mandated to strategically address the management of vacant units and timely inspections within their property portfolio.<sup>10</sup>

Quick unit turnover is both challenging and essential, requiring a delicate balance between meeting the urgent needs of residents and maintaining sustainable, quality living conditions. Financial constraints and the day-to-day operational complexities specific to public housing management contribute to a challenging process. However, the demand for affordable housing and the positive impact it has on building and sustaining communities makes quick unit turnover essential.

By prioritizing turnover, PHAs can meet the urgent housing needs within their

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<sup>8</sup> Waiting List and Tenant Selection, Public Housing Occupancy Guidebook, available at [https://www.hud.gov/sites/dfiles/PIH/documents/PHOG\\_Waiting\\_List\\_Chapter.pdf](https://www.hud.gov/sites/dfiles/PIH/documents/PHOG_Waiting_List_Chapter.pdf)

<sup>9</sup> Notice Establishing Additional Requirements for a Continuum of Care Centralized or Coordinated Assessment System, available at <https://www.hud.gov/sites/documents/17-01CPDN.PDF>.

<sup>10</sup> 24 CFR 902.22

communities. PHAs can employ these strategies to improve the turnover process for vacant units to promote efficiency, create transparency and a positive resident experience.

- i.** Conduct thorough initial assessments of the vacant units to identify necessary repairs, maintenance, and upgrades and prioritize tasks based on urgency and amount of work needed.
- ii.** Preschedule move-out inspections and promptly assign a turnaround team.
- iii.** Streamline maintenance and management processes for a seamless unit turnover process team allowing managers to focus both on resident selection and vacancies.
- iv.** Engage a qualified maintenance team to assess structural, electrical, and plumbing systems comprehensively to ensure resident satisfaction at move in and throughout tenancy.
- v.** Employ contractors and vendors when a full maintenance staff is not available.
- vi.** Maintain open communication channels with both outgoing and incoming residents and clearly communicate turnover timelines, expectations, and any necessary resident responsibilities.
- vii.** Contact residents to discuss reasons for voluntary move-out and make attempts to address the concerns and avoid vacancy. Also provide exit surveys to identify trends to address retention challenges.
- viii.** Develop a standardized documentation process for each turnover, including detailed checklists for inspections and repairs.
- ix.** Establish a system for ongoing evaluation of turnover practices, incorporating feedback from staff, residents, and relevant stakeholders. Regularly review and update these best practices to align with emerging standards and community needs.
- x.** Effectively use data that provides and predicts voluntary and eviction move-outs to anticipate and pre-plan unit turnover to best prioritize units for turnover to reduce delays.
- xi.** Provide comprehensive training for staff involved in turnover processes, covering best practices, fair housing laws, and effective customer service. Regularly update training materials to keep staff informed about industry changes.

**C. Accurately Categorizing Units:** An essential strategy for increasing and maintaining occupancy and ensuring accurate calculations of Operating Fund Grant eligibility is to ensure that unit data in IMS/PIC and its successor system is correct. The PHA must accurately categorize units to ensure the occupancy calculation is correct, and the PHA receives the right Operating Fund grant amount. Under 24 CFR 990.140, a PHA is eligible to receive operating subsidy for public housing units for each unit month that those units are under an ACC and occupied by a public housing-eligible family under lease, an approved vacancy, and a limited number of vacancies. The occupancy rate impacts the PHA's funding level, leading to maximizing the number of families assisted.<sup>11</sup>

All PHAs that receive a PHAS assessment will receive a performance designation.<sup>12</sup> The PHAS evaluates a PHA's effectiveness in overseeing the Public Housing program. HUD creates a PHAS score by employing centralized systems to gather individual subsystem scores. The goal of PHAS is to maintain, improve, and increase trust in the public housing system among PHAs, public housing residents, and the public by providing a management tool for effectively and fairly measuring a PHA's performance in essential housing operations of projects on a program-wide and individual project basis, and rewarding high performance. HUD will analyze and score project and PHA performance using the indicators outlined in 24 CFR 902.9: physical condition, financial condition, management operations (MASS), and the Capital Fund (CFP) program.

Because all Moving to Work (MTW) Agencies opted out of the PHAS assessment each agency will maintain its PHAS performance designations (e.g., high performer, standard performer, troubled) at the time of MTW designation. As informational only, MTW Agencies continue to receive PHAS indicator scores even if they do not receive an overall designation.

The MTW Expansion Agencies must follow the MTW Operations Notice<sup>13</sup>, which states that HUD will not score the MTW Expansion Agencies under PHAS until MTW considerations are incorporated into the PHAS assessment systems. PIH will be updating PHAS to include MTW specific considerations. Expansion MTW Agencies must be assessed under the updated PHAS once approved and implemented. The Initial MTW Agencies are governed under the MTW Agreement<sup>14</sup>, effective until 2028, which states that HUD will not score the MTW Initial Agencies under HUD's PHAS, or successor systems, unless the agency elects to be scored.

The MASS and CFP indicators measure occupancy. The MASS indicator evaluates how well the PHA keeps the vacancy rate low at the respective development. As the occupancy score increases, so does the MASS and CFP sub indicator score. HUD uses the data submitted on the Financial Data Schedule (FDS) to generate the MASS occupancy rate. To calculate a PHA's MASS occupancy rate, HUD divides the PHA's fiscal year unit months leased (FDS line 11210) by the unit months available (FDS line

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<sup>11</sup> 24 CFR 990.140

<sup>12</sup> 24 CFR 902

<sup>13</sup> Moving to Work Notice, available at <https://www.hud.gov/sites/dfiles/PIH/documents/FinalMTWExOpsNoticePartVIWeb.pdf>.

<sup>14</sup> Amended and Restated Moving to Work Agreement, available at [https://www.hud.gov/sites/documents/DOC\\_10240.PDF](https://www.hud.gov/sites/documents/DOC_10240.PDF).

11190). A PHA with a low assessment score may be required to submit and operate under a Corrective Action Plan monitored by the local field office. Because the FDS is required 60 days after the end of the PHA's fiscal year for unaudited financial data and nine months after the end of the fiscal year audited data, it is crucial to make sure that the units are accurately categorized to prevent inconsistencies in reporting and scoring.

Below are a few strategies and considerations to ensure the PHA boosts the MASS scoring rate, maximizes its operating and capital fund subsidy, and helps achieve an acceptable PHAS designation.

- i.** Invest in an inventory management system to improve tracking, unit categorization accuracy, funding amount, and expenditures and obligations.
- ii.** Examine the Public Housing Data Dashboard<sup>15</sup> and the PIC Error Dashboard to review the PHA's MASS Occupancy trends and the IMS/PIC Fatal Errors, respectively, to confirm that the PHA's local tracking system appropriately mirrors data within HUD systems and fatal errors are corrected.
- iii.** Establish and maintain a working relationship with the local Field Office<sup>16</sup> to review and cross-reference each unit status and the unit status' effective date to confirm that the units categorized on the PHA's internal reports match that of HUD's IMS/PIC system.
- iv.** Leverage Notice PIH 2021-35<sup>17</sup> or successor notice to ensure the PHA's unit designations in the IMS/PIC system accurately reflect the Housing Agency's inventory.
- v.** Establish a weekly, bi-weekly, or monthly quality assurance call with the appropriate PHA staff to confirm the data accuracy.
- vi.** Partner with peers for knowledge and data sharing and succession planning to ensure the PHA staff is prepared to carry out quality customer service and program delivery. To support a sustainable high program performance, PHAs are better prepared upon staff turnover.

To mitigate low occupancy throughout the year, local HUD field offices collaborate with PHAs to discuss strategies for increasing occupancy rates through an Occupancy Action Plan (OAP). The OAP is a tool that guides the Field Office (FO) and PHAs in identifying the root issues contributing to low occupancy, formalizing a strategy for improvement, and developing goals and milestones to increase occupancy.

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<sup>15</sup> Public Housing (PH) Data Dashboard, available at [https://www.hud.gov/program\\_offices/public\\_indian\\_housing/programs/ph/PH\\_Dashboard](https://www.hud.gov/program_offices/public_indian_housing/programs/ph/PH_Dashboard)

<sup>16</sup> HUD's Local Office Directory, available at <https://www.hud.gov/local>

<sup>17</sup> Notice PIH 2021-35, available at <https://www.hud.gov/sites/dfiles/PIH/documents/PIH2021-35.pdf>.

**D. Marketing and Outreach:** PHAs are mandated to provide safe, decent, and affordable housing for eligible low-income families.<sup>18</sup> PHAs may develop a marketing and outreach strategy that increases awareness and accessibility of affordable housing within their locale. Creating a newsletter, advertising through local media (e.g., radio station), or through the PHA's social media platform(s) raises awareness of the PHA's available units.<sup>19</sup>

Below is a list of practical marketing and outreach strategies some PHAs have utilized to reduce the number of vacancies:

**Advertisement:** Create reusable advertisement templates to inform the public about current vacancies, upcoming rental listings, and waiting list openings and updates (i.e., scheduled purges). Such advertisements can be posted on the PHA's website and social media outlets, emailed to listserv subscribers, advertised in local newspapers, and printed on flyers and shared with current residents, community partners, and the public. Such strategies increase the community's awareness of available housing resources and the agency's ability to fill vacant units consistently.

**Community Engagement:** Fostering meaningful relationships with community partners, resident organizations, and advocacy groups can improve the PHA's success in filling vacancies. This may include the following:

- a) Conduct outreach to local social services agencies/organizations (mental health, public schools, supportive services providers, and agencies that assist with unsheltered populations). These agencies can also assist with encouraging applicants to update their information as needed.
- b) If the PHA has a Family Self-Sufficiency (FSS) program or other supportive services program, invite the local supportive services providers to sit on the Program Coordinating Committee (PCC)<sup>20</sup> (or similar).
- c) Partner with local libraries and nonprofit organizations to provide spaces for individuals to submit Public Housing applications and check their status on the waiting list. This helps alleviate potential barriers for community members that may not have access to a computer or the internet.
- d) Prioritize PHA staff attendance and engagement with community/state and local forums and invite local agencies to

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<sup>18</sup> 42 U.S.C. 1437

<sup>19</sup> These strategies must include protocols and procedures that adhere to federal laws, regulations, and policies. The Fair Housing Act prohibits PHAs from creating and publishing discriminatory housing advertisements that indicate a preference, limitation or discrimination based on race, color, religion, sex (including gender identity and sexual orientation), disability, familial status, or national origin. For further guidance on advertising and marketing public housing units, please visit HUD's website at [https://www.hud.gov/program\\_offices/fair\\_housing\\_equal\\_opp/advertising\\_and\\_marketing](https://www.hud.gov/program_offices/fair_housing_equal_opp/advertising_and_marketing).

<sup>20</sup> 24 CFR 984.202



PHA meetings. This allows PHAs to remain abreast of updates on various aspects of the community. Additionally, PHAs will have the opportunity to share any relative updates and request support as needed.

- e) Collaborate with resident councils and resident organizations like the Resident Advisory Board (RAB) to learn effective ways PHAs can better engage the community. PHAs may actively seek to engage resident organizations on ways to improve tenant engagement and the agency's processes for disseminating information in a manner that is accessible to the public. For example, PHAs communicate details about available vacancies to current residents. Subsequently, these residents actively participate in the promotion of vacant units by sharing information within their networks, including family and friends.
- f) Export and review the area's Census data<sup>21</sup> to gauge the community's housing needs and the impact of the current housing stock on the community.

**E. Identifying Vacancy Trends:** In pursuit of optimal occupancy and effective management of public housing, PHAs can employ strategies that encompass a proactive approach to identifying and addressing vacancy trends, ensuring that housing units are efficiently utilized, community needs are met, and PHAs maintain an occupancy rate above HUD's annual occupancy goal. By leveraging insights from vacancy assessments, PHAs can allocate resources, implement targeted interventions, and plan strategically for future housing demands. Additionally, vacancy data informs policy development, foster community engagement, and facilitates performance evaluation, ultimately empowering PHAs to make informed decisions and optimize their efforts in providing safe and affordable housing solutions for their communities. PHAs recommend the following best practice strategies:

- i. Efficiently allocate resources by identifying areas with concentrated vacancies and understanding their underlying causes. Direct resources to specific neighborhoods to stimulate demand or address economic factors contributing to vacancies.
- ii. Tailor interventions to address specific needs identified through vacancy assessments. Prioritize repairs or initiatives aimed at improving property conditions in areas where vacancies are due to maintenance issues.
- iii. Anticipate future housing demand by analyzing vacancy trends. Adjust development plans or implement rental assistance programs to meet projected needs based on vacancy data.

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<sup>21</sup> The United States Census Bureau, available <https://www.census.gov/>

- iv. Inform policy development and revisions with insights from vacancy assessments. Advocate for internal and external policy changes such as making necessary revisions to the PHA's ACOP and zoning reforms for affordable housing development based on vacancy trends.
- v. Foster community engagement by involving residents, local organizations, and stakeholders in addressing vacancy challenges. Ensure that solutions align with community needs and garner support for initiatives.
- vi. Evaluate the effectiveness of strategies by tracking vacancy trends over time. Adjust approaches and measure progress toward goals by monitoring changes in vacancy rates and reasons.
- vii. Conduct detailed analyses of the demand for different unit sizes within the PHA housing portfolio. This involves tracking historical data on the popularity of various unit configurations, such as studio apartment, one-bedroom units, or larger family-sized units. This helps PHAs identify trends for available unit sizes and adjust their lease-up strategies by prioritizing the development or allocation of units that are in high demand. For instance, if there is a growing trend towards smaller energy efficient units, PHAs may focus on constructing or renovating studio or one-bedroom apartments.
- viii. Determine the length of time from application submission to occupancy for applicants to occupy the vacant units.

**F. Natural Disaster Preparedness:** Disasters can strike anytime, often without much warning, and their impact can devastate. One major consequence is the increase in vacancies resulting from resident displacement. Whether it is a natural disaster such as a hurricane, earthquake, or a pandemic, being prepared is the key for PHAs to safeguard both families and properties. For PHAs, disaster preparedness, recovery and continuity planning can mitigate the impact of long-term vacancies and help the PHA move towards optimal occupancy. HUD recommends the following resources to achieve disaster preparedness, create an efficient disaster response, and establish disaster recovery activities.

- i. The PHA Disaster Readiness, Response, and Recovery (D3R) Guidebook<sup>22</sup> is a primary source for PHAs to prepare for, respond to, and recover from a disaster. The PHA D3R guidebook serves as a critical resource created specifically for PHAs -clarifying their role in communication efforts and providing resources for funding and housing for displaced families.
- ii. HUD recommends that every PHA create, maintain, and frequently update a disaster readiness or continuity of operations plan. The PHA Disaster Readiness Plan Template<sup>23</sup> provides the framework for proactive activities

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<sup>22</sup> Disaster Readiness, Response, and Recovery Guidebook, available at [https://www.hud.gov/sites/dfiles/PIH/documents/PHA-D3R\\_Guidebook.pdf](https://www.hud.gov/sites/dfiles/PIH/documents/PHA-D3R_Guidebook.pdf)

<sup>23</sup> PHA Disaster Preparedness, available at [https://www.hud.gov/program\\_offices/public\\_indian\\_housing/pha\\_disaster](https://www.hud.gov/program_offices/public_indian_housing/pha_disaster)

that assist in identifying the PHA's risks, capacity, and resources.

- iii. The Federal Emergency Management Agency (FEMA) Continuity Resource Toolkit<sup>24</sup> provides specific guidance for PHAs in collaboration with critical services with ready resources in preparation of, during and after natural disasters.
- iv. Work with the city Emergency Management Office, community organizations, local government agencies, and residents to build a community of support for on-going planning and engagement.
- v. The Notice PIH 2016-13 provides guidance related to the ongoing use of Operating Funds for eligible units that are vacant due to a federally declared, state declared, or other declared disasters.<sup>25</sup>
- vi. HUD's Office of Capital Improvements webpage provides up-to-date guidance on Emergency funding, including Natural Disasters. FAQs, webinar presentations, and prior notices related to Emergency Capital Funds.<sup>26</sup>

**G. Matching the Public Housing Inventory to Meet the Community Needs:** Agencies routinely use evidence-based strategies, such as assessment tools and comprehensive plans to achieve optimal occupancy by identifying and developing housing that meets the demands of the community.

The PHA Plan (5-year Plan, Annual Plan, and MTW Plan) is a HUD-regulated tool that provides a strategic planning framework for PHA management operations and capital planning. If approved, this plan acts as a comprehensive guide to PHA policies, programs, operations, and strategies for identifying and meeting the local housing needs and goals.

Pursuant to Form HUD 50077 SL and Section 5A(b) of the United States Housing Act of 1937 Qualified and Non-Qualified PHAs must ensure the Five-Year and Annual Plan, respectively, are consistent with the local jurisdiction's Consolidated Plan by making reasonable efforts to identify the housing needs as identified in 24 CFR 903. The Consolidated Plan along with other supporting resources such as the PHA's waiting list data and local community needs assessments can assist PHAs with making data-driven informed decisions that thoroughly assess the affordable housing and community development needs and market conditions. Upon completion of the assessment, PHAs can use the data collected to design a strategic plan that aligns and focuses funding and community resources on community-wide needs identified as priorities. For instance, if a PHA's local jurisdiction's Consolidated Plan mentions the area lacks affordable housing for seniors ages 62 and older and/or persons with a disability, the PHA may include in their Annual Plan the intent to designate a portion of their public housing units as elderly-

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<sup>24</sup> Continuity Guidance Circular, available at <https://www.fema.gov/emergency-managers/national-preparedness/continuity/toolkit>

<sup>25</sup> Notice PIH 2016-13, available at <https://www.hud.gov/sites/documents/16-13PIHN.PDF>.

<sup>26</sup> The Office of Capital Improvements, available at [https://www.hud.gov/program\\_offices/public\\_indian\\_housing/programs/ph/capfund](https://www.hud.gov/program_offices/public_indian_housing/programs/ph/capfund)

only, disabled-only, and/or mixed population of elderly- and disabled- families. Although, the intent to designate appears in the PHA's Annual Plan, the PHA must also submit a Designated Housing Plan for HUD-approval.<sup>27</sup> This strategy has helped PHAs reduce the number of vacancies by first assessing and prioritizing community needs using data from reputable sources, creating a plan of action to address the needs, implementing the Plan, and continuously reassessing the needs and updating the plan as deemed appropriate.

Along with the strategies previously mentioned, below are other strategies PHAs may implement to continuously align their public housing inventory with local community needs.

To facilitate the preservation or rehabilitation of unmarketable units, PHAs could partner with their local field office, Resident Councils, and resident organizations to discuss repositioning strategies and explore options with the local board. Additionally, PHAs could partner with their local field office to request repositioning technical assistance through panel calls from HUD Headquarters. For PHAs with 50 or fewer Public Housing units, the Rental Assistance Demonstration (RAD) program offers a streamlined conversion strategy.<sup>28</sup> Approaches to thoroughly assess the PHA's need to undergo modernization or repositioning may include the following:

- a) Establish a strong resident engagement strategy that includes taking a wholistic approach to addressing all aspects of resident needs. HUD regulations require PHAs to encourage and support the formation of resident organizations such as Resident Councils and RABs.<sup>29</sup> PHAs may support resident engagement, managed to address residents' needs, by employing strategies like adopting preferences, forming partnerships with local companies to address transportation barriers for public housing residents who are employed, and leveraging community partners that offer onsite supportive services to residents.

PHA may conduct regular meetings with Resident Councils and resident organizations to gather input on the state of the developments and the community. For instance, as per 903.13, PHAs must establish one or more RABs, whose responsibility is to assist and make recommendations regarding the development of the PHA Plan, and any significant amendment or modification to the PHA Plan.<sup>30</sup>

- b) Use the Capital Fund five-year action plan to describe the capital

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<sup>27</sup> 42 U.S.C. 1437e

<sup>28</sup> Notice PIH 2019-23, available at [https://www.hud.gov/sites/dfiles/Housing/documents/H-2019-09-PIH-2019-23\\_RAD\\_Notice%20Rev4\\_20190905.pdf](https://www.hud.gov/sites/dfiles/Housing/documents/H-2019-09-PIH-2019-23_RAD_Notice%20Rev4_20190905.pdf)

<sup>29</sup> 24 CFR 964

<sup>30</sup> 24 CFR 903.13

needs required to ensure long-term physical and social viability of the PHA's public housing developments to include capital improvements.<sup>31</sup>

- c) Utilize waiting list data to determine the housing inventory needs, such as bedroom sizes, accessibility features, and locations. For instance, PHAs have converted both larger bedroom and studio units into 1–2-bedroom public housing units, to meet community needs. PHAs have also repositioned functionally obsolete units, or units with no demand due to their configuration, size, or location through RAD transfer of assistance, Section 18, and other tools.
- d) PHAs may consider adopting a comprehensive strategy that increases the affordable housing unit footprint (number of units) in the community. For instance, PHAs could consider increasing density to an existing public housing site as part of a redevelopment strategy, including through Inclusionary Zoning (IZ) requirements, and as part of a mixed-income community, with the new affordable rental and/or homeownership units matched to the community's housing needs. PHAs could also consider off-site development of new affordable units (including public housing, RAD, PBV units) in locations that have higher demand.

**H. Technology:** Technological advancements offer opportunities to streamline maintenance operations, improve energy efficiency, and enhance overall quality of life for residents. Integrating technology into public housing presents a dual challenge and necessity, capturing the complexities of modernizing infrastructure to meet the needs of residents while overcoming financial constraints and ensuring equitable access.

The digital divide may further complicate the integration of technology as some residents, and those in rural areas may lack access to the internet or possess the necessary digital literacy skills. Bridging this gap requires targeted efforts to provide training and ensure equitable access to technology, ensuring that all residents can benefit from advancements rather than intensifying existing disparities. Overcoming financial constraints, addressing the digital divide, and ensuring privacy are critical components of a successful technology adoption strategy. By embracing technology thoughtfully and inclusively, agencies can evolve to meet the diverse needs of residents, promoting a more connected, efficient, and equitable living environment.

Technology's essential role in the Public Housing program is emphasized in the strategies below, considering the obstacles and highlighting its ability to transform the affordable housing community.

- i. PHAs that use the Add-Ons under the Operating Fund Grant increase their operating formula calculation. Each PHA's Operating Subsidy computes \$2

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<sup>31</sup> 24 CFR 905.300

Per Unit Month (PUM) in Information Technology (IT) costs. This fee is calculated based on the total number of ACC units for the PHA. PHAs may use the additional funding to deploy the tools and technology needed to engage applicants and residents.

- ii. Consider purchasing and placing kiosks within the main office area to assist with application, rent payments, recertification, and research for ease of communication between PHA and waitlist/current residents. Kiosks allow residents to access PHA information and communicate with PHA staff from remote locations. The accessibility of information is helpful for those with challenges getting to the PHA to complete forms and conduct business without making an appointment with the PHA staff.
- iii. Regularly assess the effectiveness of implemented technologies through feedback from staff and residents.
- iv. Employ collaboration tools to bridge communication gaps with residents such as resident portals and electronic communication and automation tools that expand current management system utilization and applications.
- v. Stay informed about emerging technologies and be ready to adapt systems to meet changing needs and industry advancements.
- vi. To streamline the application process, PHAs continue to upgrade the application system to offer accommodations, accessibility, and user-friendly features. As a result, interested parties can submit applications from anywhere if there is an electronic device and broadband connection.

## 5. Additional Resources

**PHA Capacity Building Tools:** PHAs can increase their capacity and knowledge related to occupancy and HUD regulations by reviewing the PHA Occupancy Webinar Series,<sup>32</sup> which details the requirements, conditions, and terms related to unit categorization, unit turnaround, repositioning strategies<sup>33</sup> and completing a Physical Needs Assessment.<sup>34</sup>

**Eviction Prevention:** Several housing counseling agencies are dedicated to assisting rent-burden families facing eviction through affordable rental housing counseling and eviction prevention.<sup>35</sup>

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<sup>32</sup> The PHA Occupancy Webinar Series, available at <https://www.hudexchange.info/news/pha-occupancy-webinar-series/>

<sup>33</sup> Repositioning Frequently Asked Questions and Other Handouts, available at [https://www.hud.gov/program\\_offices/public\\_indian\\_housing/repositioning/faqs](https://www.hud.gov/program_offices/public_indian_housing/repositioning/faqs)

<sup>34</sup> 24 CFR 990.190.

<sup>35</sup> Strengthening Partnerships with Continuums of Care and Housing Counseling Agencies, available at <https://files.hudexchange.info/resources/documents/Strengthening-Partnerships-With-CoCs-and-Housing-Counseling-Agencies.pdf>

## 6. Conclusion

These initiatives<sup>36</sup> will assist the PHA in improving, maintaining, and advancing the quality of the Public Housing program. Furthermore, these strategies provide solutions to overcome impediments to housing more families and achieving optimal occupancy.

## 7. Contact Information

For further information about this notice, PHAs may contact the nearest HUD Office of Public Housing within their state.<sup>37</sup>



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Richard J. Monocchio  
Principal Deputy Assistant Secretary  
for Public and Indian Housing

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<sup>36</sup> PHAs must comply with non-discrimination and equal opportunity laws and regulations when implementing any strategies mentioned.

<sup>37</sup> HUD's Local Office Directory, available at <https://www.hud.gov/local>