

Public Housing

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Administering Agency: HUD's Office of Public and Indian Housing (PIH)

Year Started: 1937

Number of Persons/Households Served:

According to PIH's [Data Dashboard: https://bit.ly/3S6wk4G](https://bit.ly/3S6wk4G), as of December 7, 2024, 1,569,768 residents lived in public housing (a 4% decrease from 2023 on top of a 5% decline from 2022), 543,986 of whom were children (a 6% decrease from 2023 on top of a 6% decrease from 2022) as PIH continues public housing "repositioning." According to "Picture of Subsidized Housing" posted by HUD's Office of Policy Development and Research (PD&R), there were 1,604,633 residents living in public housing based on 2023 Census data. Since last year's *Advocates' Guide*, PIH no longer posts data via the [Resident Characteristics Report: https://bit.ly/3S561fb](https://bit.ly/3S561fb).

Population Targeted: All households must have income less than 80% of the area median income (AMI); at least 40% of new admissions in any year must have extremely low income, income less than 30% of AMI or the federal poverty level, whichever is greater. According to *Picture of Subsidized Housing*, 72% of the households had extremely low incomes.

Funding: For FY25, the Administration requested \$3.228 billion for the Capital Fund and \$5.228 billion for the Operating fund. As *Advocates' Guide* went to press, Congress had not passed an FY25 appropriation's act; a short-term Continuing Resolution (CR) keeps public housing funding at FY24 levels until further congressional action.

Congress appropriated \$3.410 billion for the Capital Fund and \$5.501 billion for the Operating Fund for FY24; \$3.380 billion for the Capital Fund and \$5.134 billion for the Operating Fund

in FY23; and \$3.388 billion for the Capital Fund and \$5.064 billion for the Operating Fund in FY22; \$2.9 billion for the Capital Fund and \$4.9 billion for the Operating Fund in FY21; and \$2.9 billion for the Capital Fund and \$4.5 billion for the Operating Fund in FY20.

See Also: For related information, refer to the *Rental Assistance Demonstration*, *Public Housing Repositioning*, and *Public Housing Agency Plan* sections of this guide.

Summary

The nation's dwindling number of public housing units, 883,877 (Data Dashboard), down from 1.1 million in previous years, still serve 1,569,768 residents (down from nearly 2 million in previous years). Public housing is administered by a network of 2,693 local public housing agencies (PHAs) that have 6,272 developments (Data Dashboard). Funding for public housing consists of residents' rents and congressional appropriations to HUD. Additional public housing has not been built in decades.

Public housing encounters many recurring challenges. For instance, PHAs face significant federal funding shortfalls each year, as they have for decades. In addition, policies such as demolition, disposition, and the former HOPE VI program have resulted in the loss of public housing units – approximately 10,000 units each year according to HUD estimates. [Picture of Preservation 2024: https://bit.ly/42LIC8S](https://bit.ly/42LIC8S) from NLIHC and PAHRC finds that approximately 267,000 public housing homes (30%) were in public housing developments that failed their most recent Real Estate Assessment Center (REAC) physical inspection and likely require immediate investment – twice the number that failed in 2019. One in five public housing homes were in developments that have also failed two or more of their latest REAC scores, up from 9% in 2019.

HUD's aggressive "Public Housing Repositioning" campaign is speeding up the pace of demolition, disposition, and conversion of public housing to either Project-Based Vouchers (PBVs) or Project-Based Rental Assistance (PBRA) through the [Rental Assistance Demonstration: https://www.hud.gov/RAD](https://www.hud.gov/RAD) (RAD). See the *Repositioning of Public Housing* and the *Rental Assistance Demonstration* sections of this guide.

Congress authorized the expansion of the miss-named [Moving to Work \(MTW\) Demonstration: https://bit.ly/3RALTbw](https://bit.ly/3RALTbw) in 2016. MTW is fundamentally a scheme to deregulate public housing that can reduce affordability, deep income targeting, resident participation, and program accountability, all aspects of public housing that make it an essential housing resource for many of the lowest income people (see the Moving to Work and Expansion section in Chapter 4 of this guide).

HUD's does have one modest tool to address the aging public housing stock through the [Choice Neighborhoods Initiative: \(CNI\)](#) renovation program, but it enables limited CNI implementation funds to be used for privately owned, HUD-assisted Multifamily properties as well as broader neighborhood improvements. Congress approved only \$75 million for CNI in FY24, down from \$350 million in FY23; consequently, all of the FY24 appropriation was devoted to CNI planning grants and none was made available for CNI implementation grants.

History

The "Housing Act of 1937" established the public housing program. President Nixon declared a moratorium on public housing in 1974, shifting the nation's housing assistance mechanism to the then-new Section 8 programs (both new construction and certificate programs) intended to engage the private sector. Federal funds for adding to the public housing stock were last appropriated in 1994, but little public housing has been built since the early 1980s.

In 1995, Congress stopped requiring demolished public housing units be replaced on a unit-by-unit, one-for-one basis. In 1998, the "Quality Housing and Work Responsibility Act" (QHWRA) changed various aspects of public housing, including public housing's two main funding streams, the operating and capital subsidies. Federal law capped the number of public housing units at the number each PHA operated as of October 1, 1999 ([the Faircloth cap: https://bit.ly/4ivdizC](https://bit.ly/4ivdizC)).

Today, units are being lost by the cumulative impact of decades of underfunding and neglect of once-viable public housing units. HUD officials have repeatedly stated for years that more than 10,000 units of public housing leave the affordable housing inventory each year due to underfunding. As a response HUD has promoted its "[Public Housing Repositioning": https://bit.ly/3YgfGDh](https://bit.ly/3YgfGDh) policy, which has three components, all of which reduce the stock of public housing: [Section 18 demolition and disposition: https://bit.ly/3S53TEg](https://bit.ly/3S53TEg) (sale) of units; [Section 22 voluntary and Section 33 mandatory: https://bit.ly/3E-Dodth](https://bit.ly/3E-Dodth) conversion of public housing to voucher assistance; and the [Rental Assistance Demonstration: https://www.hud.gov/rad](https://www.hud.gov/rad). (See the *Repositioning of Public Housing* and the *Rental Assistance Demonstration* sections of this guide).

According to HUD testimony, between the mid-1990s and 2010, approximately 200,000 public housing units were demolished, while about only 50,000 units were replaced with new public housing units and another 57,000 former public housing families were given vouchers instead of a public housing replacement unit. Another nearly 50,000 units of non-public housing were incorporated into these new developments, but they serve households with income higher than those of the displaced households and do not provide deep rental assistance like that provided by the public housing program.

Program Summary

According to PIH's [Data Dashboard: https://bit.ly/3S6wk4G](https://bit.ly/3S6wk4G), as of December 7, 2024, there were 883,877 public housing units (23,183 fewer units than the same period in 2023). According to the Data Dashboard, 44% of public housing residents were elderly or disabled, while [Picture of Subsidized Housing: https://bit.ly/4iAB79f](https://bit.ly/4iAB79f) indicates that in 2023, 30% of heads of households were non-elderly disabled, 40% of heads of households were elderly, and 34% were households with children. The Data Dashboard indicates that the average annual income of a public housing household was \$17,426, up from \$15,701. Picture of Subsidized Housing indicates that of all public housing households, 72% were extremely low-income. Sixty-seven percent of public housing households had income less than \$20,000 a year. The Data Dashboard indicates that 29% had wage income.

The demand for public housing far exceeds the supply. In many large cities, households may remain on waiting lists for decades. Like all HUD rental assistance programs, public housing is not an entitlement program; rather, its size is determined by annual appropriations and is not based on the number of households that qualify for assistance.

NLIHC's report from October of 2016, [Housing Spotlight: The Long Wait for a Home: https://bit.ly/4izUhMJ](https://bit.ly/4izUhMJ), is about public housing and Housing Choice Voucher (HCV) waiting lists. An NLIHC survey of PHAs indicated that public housing waiting lists had a median wait time of nine months and 25% of them had a wait time of at least 1.5 years. Public housing waiting lists had an average size of 834 households. Picture of Subsidized Housing showed an average public housing waiting list of 20 months in 2023.

ELIGIBILITY AND RENT

Access to public housing is means tested. All public housing households must be low-income,

(have income less than 80% of the area median income, AMI), and at least 40% of new admissions in any year must have extremely low incomes, defined as income less than 30% of AMI or the federal poverty level (each adjusted for family size), whichever is greater. According to Picture of Subsidized Housing, 72% of public housing households in 2023 had extremely low incomes. The FY14 HUD appropriations act expanded the definition of "extremely low-income" for HUD's rental assistance programs by including families with income less than the poverty level to better serve poor households in rural areas. PHAs can also establish local preferences for certain populations, such as elderly people, people with disabilities, veterans, full-time workers, domestic violence victims, or people who are experiencing homelessness or who are at risk of becoming homeless.

As in other federal housing assistance programs, residents of public housing pay the highest of: (1) 30% of their monthly adjusted income; (2) 10% of their monthly gross income; (3) their welfare shelter allowance; or (4) a PHA-established minimum rent of up to \$50. The Data Dashboard indicated that the average public housing household paid \$369 per month toward rent and utilities in 2024. Public housing Operating and Capital Fund subsidies provided by Congress and administered by HUD's Office of Public and Indian Housing (PIH) contribute the balance of what PHAs receive to operate and maintain their public housing units.

With tenant rent payments and HUD subsidies, PHAs are responsible for maintaining the housing, collecting rents, managing waiting lists, and carrying out other activities related to the operation and management of public housing. Most PHAs also administer the Housing Choice Voucher Program (see the *Housing Choice Vouchers* section of this guide).

Most PHAs are required to complete five-year PHA Plans, along with annual updates, which detail many aspects of their housing programs,

including waiting list preferences, grievance procedures, plans for capital improvements, minimum rent requirements, and community service requirements. PHA Plans represent a key tool for public housing residents, voucher households, and community stakeholders to participate in a PHA's planning process (see the *Public Housing Agency Plan* section of Chapter 8 of this guide).

RESIDENT PARTICIPATION

Resident Advisory Boards

QHWRA created Resident Advisory Boards (RABs) to ensure that public housing and voucher-assisted households can meaningfully participate in the PHA Plan process. Each PHA must have a RAB consisting of residents elected to reflect and represent the population served by the PHA. Where residents with Housing Choice Vouchers make up at least 20% of all assisted households served by the PHA, voucher households must have “reasonable” representation on the RAB.

The basic role of the RAB is to make recommendations to the PHA and assist in other ways with drafting the PHA Plan and any significant amendments to the PHA Plan. By law, PHAs must provide RABs with reasonable resources to enable them to function effectively and independently of the PHA. Regulations regarding RABs are in the PHA Plan regulations, [24 CFR Part 903: https://bit.ly/3GDty4n](https://bit.ly/3GDty4n). See the *Public Housing Agency Plan* section of this guide for more information about the PHA Plan.

Part 964 Resident Participation Regulations

A federal rule provides public housing residents with the right to organize and elect a resident council to represent their interests. This regulation, [24 CFR Part 964: https://bit.ly/4jprOu3](https://bit.ly/4jprOu3), spells out residents' rights to participate in all aspects of public housing development operations. Residents must be allowed to be actively involved in a PHA's decision-making process

and to give advice on matters such as maintenance, modernization, resident screening and selection, and recreation. The rule defines the obligation of HUD and PHAs to support resident participation activities through training and other activities.

A resident council is a group of residents representing the interests of residents and the properties they live in. Some resident councils are made up of members from just one property, so a PHA could have a number of resident councils. Other resident councils, known as jurisdiction-wide councils, are made up of members from many properties. A resident council is different from a RAB because the official role of a RAB is limited to helping shape the PHA Plan. Resident councils can select members to represent them on the RAB.

Most PHAs are required to provide \$25 per occupied unit per year from their annual operating budget from PIH to pay for resident participation activities. A minimum of \$15 per unit per year must be distributed to resident councils to fund activities such as training and organizing. Up to \$10 per unit per year may be used by a PHA for resident participation activities. A PHA may choose to distribute the full \$25 per unit per year to resident councils. On May 18, 2021, PIH issued [Notice PIH 2021-16: https://bit.ly/4iABtNt](https://bit.ly/4iABtNt) updating guidance on the use of tenant participation funds (previously provided by [Notice PIH 2013-21: https://www.hud.gov/sites/documents/pih2013-21.pdf](https://www.hud.gov/sites/documents/pih2013-21.pdf) issued on August 23, 2013).

Notice PIH 2021-16 echoes Notice PIH 2013-21, but in general has more details. Key changes include:

- PHAs and Resident Councils (RCs) are encouraged to develop written agreements that establish a collaborative partnership, provide flexibility, and support RC leaders' autonomy. The Notice provides four minimum provisions that must be in a written agreement. It also has eight recommended best practices.

- If there is no duly elected RC, PHAs are encouraged to inform residents that tenant participation (TP) funds are available. Also, PHAs are encouraged to use up to \$10 per unit to carry out tenant participation activities, including training and building resident capacity to establish and operate an RC.
- A new section officially sanctions what has always been practice – that a PHA may fund an RC above the \$15 minimum.
- Any TP funds remaining in RC-controlled accounts at the end of a calendar year may remain in those accounts for future RC expenses.
- Public housing residents in mixed-income communities are eligible to use TP funds.

More information is on NLIHC's Public Housing webpage, <https://nlihc.org/explore-issues/housing-programs/public-housing>, including an outline of key Part 964 features, <https://tinyurl.com/46wcrvsf>.

24 CFR Part 964, *Tenant Participation and Tenant Organizing in Public Housing Regulations*, is at <https://www.ecfr.gov/current/title-24/subtitle-B/chapter-IX/part-964?toc=1>

Resident Commissioners

The law also requires every PHA, with a few exceptions, to have at least one person on its governing board who is either a public housing or voucher resident. HUD's rule regarding the appointment of resident commissioners, at Part 964, states that residents on boards should be treated no differently than non-residents.

PUBLIC HOUSING CAPITAL FUND AND OPERATING FUND

PHAs receive two annual, formula-based grants from congressional appropriations to HUD, the Operating Fund and the Capital Fund. As *Advocates' Guide* went to press, Congress had not passed an FY25 appropriation's act; a short-term

Continuing Resolution keeps public housing funding at FY24 levels until further congressional action. Congress appropriated \$3.410 billion for the Capital Fund and \$5.501 billion for the Operating Fund for FY24; \$3.380 billion for the Capital Fund and \$5.134 billion for the Operating Fund in FY23; and \$3.388 billion for the Capital Fund and \$5.064 billion for the Operating Fund in FY22; \$2.9 billion for the Capital Fund and \$4.9 billion for the Operating Fund in FY21; and \$2.9 billion for the Capital Fund and \$4.5 billion for the Operating Fund in FY20.

In 2010, a study sponsored by HUD concluded that PHAs had a \$26 billion capital needs backlog, which was estimated to grow by \$3.4 billion each year. For 2025 HUD extrapolated the capital needs backlog to be at least \$50 billion. Associations representing PHAs estimated that there was approximately a \$70 billion capital needs backlog in FY20 that continues to grow. *Picture of Preservation 2024*: <https://bit.ly/42LIC8S> from NLIHC and PAHRC finds that approximately 267,000 public housing homes (30%) were in public housing developments that failed their most recent Real Estate Assessment Center (REAC) physical inspection and likely require immediate investment – twice the number that failed in 2019. One in five public housing homes were in developments that have also failed two or more of their latest REAC scores, up from 9% in 2019.

The public housing Operating Fund is designed to make up the balance between what residents pay in rent and what it actually costs to operate public housing. Major operating costs include routine and preventative maintenance, a portion of utilities, management, PHA employee salaries and benefits, supportive services, resident participation support, insurance, and security. Other operating costs include recertification of residents' income, annual unit inspections, and planning for long-term capital needs to maintain properties' viability. Since 2008, HUD's operating formula system, called "Asset Manage-

ment,” has determined a PHA’s operating subsidy on a property-by-property basis (called an Asset Management Project, AMP), rather than on the previous overall PHA basis. HUD states that \$5.1 billion it requested for FY25 is projected to be sufficient to meet 90% of all public housing operating expenses. However, HUD claims that when \$5.1 billion should be sufficient if paired with existing PHA reserves and \$178 million in shortfall funding it requested from Congress to protect PHAs with low operating reserves.

The Capital Fund can be used for a variety of purposes, including addressing deferred maintenance, modernization, demolition, resident relocation, development of replacement housing, and carrying out resident economic self-sufficiency programs. Up to 20% can also be used to make management improvements. The annual capital needs accrual amount (estimated in 2010 to be \$3.4 billion each year) makes clear that annual appropriations for the Capital Fund are woefully insufficient to keep pace with the program’s needs. A statutory change in 2016 (HOTMA, see “Statutory and Regulatory Changes Made in 2016” below) now allows a PHA to transfer up to 20% of its Operating Fund appropriation for eligible Capital Fund uses.

Programs Affecting Public Housing

DEMOLITION AND DISPOSITION

Since 1983, PIH has authorized PHAs to apply for permission to demolish or dispose of (sell) public housing units. This policy was made significantly more damaging in 1995 when Congress suspended the requirement that PHAs replace, on a one-for-one basis, any public housing lost through demolition or disposition. In 2016, HUD reported a net loss of more than 139,000 public housing units due to demolition or disposition since 2000. [Demolition and disposition: https://bit.ly/42LIDJY](https://bit.ly/42LIDJY) policy is authorized by Section 18 of the “Housing Act”

with regulations at [24 CFR part 970: https://bit.ly/4iABuRx](https://bit.ly/4iABuRx) and various PIH Notices.

A PHA must apply to PIH’s [Special Applications Center \(SAC\): https://bit.ly/4iABvoz](https://bit.ly/4iABvoz) to demolish or dispose of public housing under Section 18. The application must certify that the PHA has described the demolition or disposition in its Annual PHA Plan and that the description in the application is identical. Advocates should challenge an application that is significantly different. PHAs should not re-rent units when they turn over while PIH is considering an application. The information in this article is primarily from the regulations 24 CFR 970.

In 2012, after prodding from advocates, PIH under the Obama Administration clarified and strengthened its guidance ([Notice PIH 2012-7: https://www.hud.gov/sites/documents/pih2012-7.pdf](https://www.hud.gov/sites/documents/pih2012-7.pdf)) regarding demolition and disposition in an effort to curb the decades-long needless destruction or sale of the public housing stock. The 2012 Notice served as a reminder to residents, the public, and PHAs of PHAs’ obligations regarding resident involvement and the role of the PHA Plan regarding demolition/disposition.

In 2018, the Trump Administration eliminated Notice PIH 2012-07 from 2012 that included modest improvements suggested by advocates. The replacement, [Notice PIH 2018-04: https://bit.ly/4iABvVB](https://bit.ly/4iABvVB), downplayed the role of resident consultation, making it easier to demolish public housing. In addition, the Administration withdrew proposed regulation changes drafted in 2014 that would have reinforced those modest improvements.

PIH began allowing 25% of the units in a RAD project to convert to PBVs under Section 18 in [Notice PIH 2018-11: https://bit.ly/4iABwsD](https://bit.ly/4iABwsD) on July 2, 2018, the beginning of the “RAD/Section 18 Blend.” On January 19, 2021, PIH posted [Notice PIH 2021-07: https://bit.ly/3Y-bxLIZ](https://bit.ly/3Y-bxLIZ), which superseded Notice PIH 2018-04. The primary change was to the “RAD/Section

18 Blend,” allowing a PHA to apply to SAC for approval to dispose of public housing “because it is not in the best interests of the residents and the PHA” to keep the property as public housing. In short, the drastically changed provision allowed a PHA to convert anywhere from 40% to 80% of the units in a RAD project to PBVs under Section 18. [Notice PIH 2024-40: https://bit.ly/4iABxgb](https://bit.ly/4iABxgb) issued on December 26, 2024 replaced Notice PIH 2021-07, modifying the percentage of units in a RAD/Section 18 Blend project that could be Section 18 PBV units from 30% to 90%. The percentage of units eligible for disposition within a RAD project is based on the “hard construction costs” of the proposed rehabilitation or new construction.

These RAD/Section 18 Blend Notices further accelerate PIH’s public housing “repositioning” policy (see the *Rental Assistance Demonstration* article for more about RAD/Section 18 Blends).

Although NLIHC and other advocates have urged PIH during the Biden Administration to restore key elements of Notice PIH 2012-7 as well as improve fair housing review prior to approving Section 18 demolition/disposition actions, PIH did not indicate an intent to issue improved demolition/disposition regulations similar to those proposed by the Obama Administration.

However, in the closing days of the Biden Administration (December 26, 2024), PIH issued [Notice PIH 2024-40: https://bit.ly/4iABxgb](https://bit.ly/4iABxgb), which made a number of changes that included several urged by NLIHC and the National Housing Law Project. There are major improvements regarding resident consultation and resident relocation, and consideration of the “commensurate public benefit” provision so that it better targets truly low-income people. The new Notice also adds references to vacant land which is also subject to Section 18 disposition.

For more information about demolition and disposition is in the *Repositioning of Public Housing* entry in this guide.

Rental Assistance Demonstration

As part of its FY12 HUD appropriations act, Congress authorized the [Rental Assistance Demonstration: https://www.hud.gov/RAD](https://www.hud.gov/RAD) (RAD), which allowed HUD to approve the voluntary conversion of up to 60,000 public housing and Section 8 Moderate Rehabilitation Program units into either Section 8 Project-Based Rental Assistance contracts (PBRA) or Project-Based Vouchers (PBV) by September 2015. Since then, Congress has increased the cap three times, first to 185,000 units, then to 225,000, and now to 455,000 units. The deadline for making conversions has been extended periodically, now set at September 30, 2029 by the FY24 appropriations act. The Senate FY23 appropriations bill and HUD’s budget request to Congress proposed removing the 455,000-unit cap as well as the sunset date, but it did not pass.

The Obama, first Trump, and Biden Administrations, along with many developer-oriented organizations, have urged Congress to remove the cap and allow all public housing units to undergo RAD conversion, even though the “demonstration” has yet to adequately demonstrate that the resident protection provisions in the statute and RAD implementation Notices are being fully realized. Many residents whose public housing properties have been approved for RAD complain that PHAs, developers, and HUD have not provided adequate information, causing many to doubt that the resident protections in the enabling legislation and RAD implementation Notices will be honored by PHAs and developers or monitored by HUD. NLIHC strongly opposes increasing or eliminating the cap until this “demonstration” has convincingly shown that HUD will rigorously monitor PHA and owner compliance with all tenant protections written into the RAD statute and RAD Notice. See the *Rental Assistance Demonstration* section of this guide for more information.

Moving to Work

A key public housing issue is the so-called [Moving to Work \(MTW\) demonstration: https://bit.ly/3RALTbw](https://bit.ly/3RALTbw) that provides a limited number of housing agencies flexibility from most statutory and regulatory requirements. Because the original demonstration program has not been evaluated, particularly regarding the potential for harm to residents, NLIHC has long held that the MTW demonstration is not ready for expansion or permanent authorization. Various legislative vehicles have sought to maintain and expand the current MTW program. The original MTW involved 39 PHAs. The MTW contracts for each of these 39 PHAs were set to expire in 2018, but in 2016 HUD extended all of them to 2028.

The three MTW statutory goals are:

1. Reducing costs and increasing cost-effectiveness;
2. Providing incentives for resident self-sufficiency; and
3. Increasing housing choices for low-income households.

PHAs granted MTW status (“MTW agencies”) must meet five statutory requirements:

1. Ensure that 75% of the households they assist have income at or less than 50% of area median income (AMI);
2. Establish a reasonable rent policy;
3. Assist substantially the same number of low-income households as a PHA would without MTW funding flexibility;
4. Assist a mix of households by size comparable to the mix a PHA would have served if it were not in MTW; and
5. Ensure that assisted units meet housing quality standards.

In practice, HUD’s enforcement of these requirements for the original 39 MTW agencies has been highly permissive.

The FY16 appropriations act [expanded the MTW demonstration: https://bit.ly/3RALTbw/expansion](https://bit.ly/3RALTbw) by a total of 100 PHAs over the course of a seven-year period. Of the 100 new PHA MTW sites, no fewer than 50 PHAs must administer up to 1,000 combined public housing and voucher units, no fewer than 47 must administer between 1,001 and 6,000 combined units, no more than three can administer between 6,001 and 27,000 combined units, and five must be PHAs with portfolio-wide awards under RAD. PHAs were to be added to the MTW demonstration by cohort (groups), each of which is to be overseen by a research advisory committee to ensure the demonstrations are evaluated with rigorous research protocols. Each cohort of MTW sites were to be directed by PIH to test one specific policy change.

The cohorts are:

- “[MTW Flexibilities: https://www.hud.gov/program_offices/public_indian_housing/programs/ph/mtw/expansion/cohort1](https://www.hud.gov/program_offices/public_indian_housing/programs/ph/mtw/expansion/cohort1),” the first cohort announced in January 2017, involves smaller PHAs that have a combination of 1,000 or fewer public housing units and vouchers. This cohort allows PHAs to use any of the regulatory waivers in the Final MTW Operations Notice (see below) in order to evaluate the overall effects of MTW flexibility on a PHA and its residents. [Thirty-one PHAs were selected: https://www.hud.gov/sites/dfiles/PIH/documents/MTWExpansionCohort1SelecteesJanuary2021.pdf](https://www.hud.gov/sites/dfiles/PIH/documents/MTWExpansionCohort1SelecteesJanuary2021.pdf).
- “[MTW Flexibilities II](https://www.hud.gov/program_offices/public_indian_housing/programs/ph/mtw/expansion/mtwflexibilityii),”: https://www.hud.gov/program_offices/public_indian_housing/programs/ph/mtw/expansion/mtwflexibilityii the last cohort announced in August 2023, will involve additional smaller PHAs that have 1,000 or fewer combined units of public housing and vouchers. These MTW PHAs will test the overall effects of using various MTW “flexibilities,” with a focus on “administrative efficiencies.” [Fourteen PHAs: https://bit.ly/4iABykf](https://bit.ly/4iABykf) were selected on March, 29 2024.

- “[Rent Reform/Stepped and Tiered Rent](https://bit.ly/4iABYRh)”: <https://bit.ly/4iABYRh> involves 10 PHAs: <https://bit.ly/4iABz7N> testing “rent reform” ideas of using “stepped rents” or “tiered rents,” which PIH claims is designed to “increase resident self-sufficiency and reduce PHA administrative burdens.” Stepped rent is a form of time limit; it is a scheme that increases a household’s rent on a fixed schedule in both frequency and amount, starting at 30% of gross income and growing each year. “Tiered rents” involve a household paying a fixed amount for rent if their income is in a set range, which could result in rent burden. Only PHAs with a combination of at least 1,000 non-elderly and non-disabled public housing residents and voucher households were eligible. NLIHC and other advocates urged PIH not to implement this cohort because of its serious potential to impose cost burdens on residents. NLIHC has a [summary](https://bit.ly/3S2E9Zc): <https://bit.ly/3S2E9Zc> of the MTW Rent Reform cohort.
- “[Landlord Incentives](https://bit.ly/3S3cR4O)”: <https://bit.ly/3S3cR4O> explores ways to increase and sustain landlord participation in the Housing Choice Voucher program. [Twenty-nine](https://bit.ly/4iu3x4U): <https://bit.ly/4iu3x4U> PHAs were selected. NLIHC has prepared a [summary of key provisions](https://bit.ly/3EG0WqF): <https://bit.ly/3EG0WqF> of the landlord incentives Notice.
- “[Asset Building](https://bit.ly/3YbgGZu)”: <https://bit.ly/3YbgGZu> experiments with policies and practices that help residents build financial assets and/or build credit. For the purpose of this cohort, asset building is defined as activities that encourage the growth of assisted residents’ savings accounts and/or that aim to build credit for assisted households. [Eighteen PHAs were selected](https://bit.ly/4iyFTV4): <https://bit.ly/4iyFTV4>. NLIHC has prepared a “[Summary of the Key Features of the MTW Asset Building Cohort](https://bit.ly/3RzIZgn).”: <https://bit.ly/3RzIZgn>
- “[Work Requirements](https://bit.ly/4iQ2OLL)”: <https://bit.ly/4iQ2OLL> was rescinded in June 2021. NLIHC and other advocates vehemently opposed this proposed cohort.

A [final Operations Notice](https://bit.ly/3hCrqZf): <https://bit.ly/3hCrqZf> providing overall direction to all MTW Expansion PHAs was published on August 28, 2019. It allows an Expansion MTW PHA to impose a potentially harmful work requirement, time limit, or burdensome rent “MTW Waiver” without securing HUD approval and without the rigorous evaluation called for by the statute. See NLIHC’s [Summary of Key Provisions of the MTW Demonstration Operations Notice](https://nlihc.org/sites/default/files/March_Modified_Summary_of_MtW_Waivers_Starting_w_5_Most_Harmful_Waivers.pdf): https://nlihc.org/sites/default/files/March_Modified_Summary_of_MtW_Waivers_Starting_w_5_Most_Harmful_Waivers.pdf for more information.

Other important features of the MTW Expansion include:

- Expansion MTW agencies must submit an “[MTW Supplement](https://bit.ly/3S3hdcb)”: <https://bit.ly/3S3hdcb> to the Annual PHA Plan. So-called “Qualified PHAs,” those with fewer than 550 public housing units and vouchers combined, will be required to submit an MTW Supplement each year even though they do not have to submit a regular PHA Plan. The MTW Supplement must go through a public process along with the Annual PHA Plan, following all of the Annual PHA Plan public participation requirements.
- An Expansion MTW PHA agency must implement one or multiple “reasonable rent policies” during the term of its MTW designation. PIH defines a reasonable rent policy as any change in the regulations on how rent is calculated for a household, such as any Tenant Rent Policies in Appendix I.
- Expansion MTW PHAs will maintain MTW designation for 20 years, with the MTW waivers expiring at the end of the 20-year term.
- An Expansion MTW PHA’s MTW program applies to all of the Expansion MTW PHA’s public housing units, tenant-based HCV assistance, project-based HCV assistance (PBV), and homeownership units.
- An Expansion MTW PHA may spend up to 10% of its HCV Housing Assistance Payment (HAP) funding on “local, non-traditional

activities,” as described in Appendix I of the MTW Expansion Operations Notice, without prior HUD approval. Examples include providing shallow rent subsidies, rent subsidies to supportive housing programs to help households experiencing homelessness, services to low-income people who are not public housing or voucher tenants, and gap-financing to develop Low Income Housing Tax Credit (LIHTC) properties. An Expansion MTW PHA may spend more than 10% by seeking PIH approval through a Safe Harbor Waiver. NLIHC urged PIH to remove this option because it has the effect of reducing the number of HCVs a PHA could use to house residents.

For much more information about the MTW demonstration, see the *Moving to Work and Expansion* article in this guide.

CHOICE NEIGHBORHOODS INITIATIVE

The [Choice Neighborhoods Initiative](#): (CNI), created in FY10, was HUD’s successor to the HOPE VI Program. Like HOPE VI, CNI focuses on severely distressed public housing properties, but CNI expands HOPE VI’s reach to include HUD-assisted, private housing properties and entire neighborhoods. Although unauthorized, CNI has been funded through annual appropriations bills and administered according to the details of HUD Notices of Fund Opportunity (NOFOs). HUD proposed eliminating CNI in FY19, FY20, and FY21, but Congress has continued to approve funding for CNI, approving \$150 million in FY19, \$175 million in FY20 \$200 million in FY21, and \$350 million for FY22 and FY23. The Biden Administration proposed \$185 million for FY24, while the Senate proposed \$150 million and the House proposed zero, with the final appropriation being only \$75 million. For FY25 the Biden Administration proposed \$140 million, while the Senate proposed \$100 million, and the House again proposed zero.

HUD states that CNI has three goals:

1. Housing: Replace distressed public and HUD-assisted private housing with mixed-income housing that is responsive to the needs of the surrounding neighborhood.
2. People: Improve employment and income, health, and children’s education outcomes; and
3. Neighborhood: Create the conditions necessary for public and private reinvestment in distressed neighborhoods to offer the kinds of amenities and assets, including safety, good schools, and commercial activity, that are important to families’ choices about their community.

In addition to PHAs, grantees can include HUD-assisted private housing owners, local governments, nonprofits, and for-profit developers. The CNI Program awards both large implementation grants and smaller planning grants. CNI planning grants are to assist communities in developing a comprehensive neighborhood revitalization plan, called a Transformation Plan, and in building the community-wide support necessary for that plan to be implemented. One hundred and forty-four planning grants totaling approximately \$70 million were [awarded](#): <https://bit.ly/4iyvXL9> through September 2024. The FY 24 planning grants NOFO was posted on April 9, 2024, announcing up to \$10 million for awards, with a maximum award of \$500,000. HUD announced [13 FY24 planning grants](#): <https://bit.ly/3S9uiRe> totaling \$6,500,000 on September 10, 2024.

CNI implementation grants are intended primarily to help transform severely distressed public housing and HUD-assisted private housing developments through rehabilitation, demolition, and new construction. HUD also requires applicants to prepare a more comprehensive plan to address other aspects of neighborhood distress such as violent crime, failing schools, and capital disinvestment. Funds can also be used for supportive services and improvements

to the surrounding community, such as developing community facilities and addressing vacant, blighted properties. Fifty-nine implementation grants (generally at \$50 million) totaling more than \$2 billion were [awarded: https://bit.ly/44b1uiQ](https://bit.ly/44b1uiQ) through July 2024. HUD posted the FY23 NOFO on September 6, 2023, announcing \$259 million available for awards of up to \$50 million each. Congress only approved \$75 million for CNI in FY24, therefore HUD did not issue a separate FY24 CNI NOFO, instead focusing on planning grants. HUD awarded [seven new: https://bit.ly/3RALT52](https://bit.ly/3RALT52) FY23/FY24 CNI implementation awards amounting to approximately \$306 million.

Although each NOFO has been different, key constant features include:

- One-for-one replacement of all public and private HUD-assisted units.
- Each resident who wishes to return to an improved development may do so.
- Residents who are relocated during redevelopment must be tracked until the transformed housing is fully occupied.
- Existing residents must have access to the benefits of the improved neighborhood.
- Resident involvement must be continuous, from the beginning of the planning process through implementation and management of the grant.

The Lead Applicant must be a PHA, a local government, or a tribal entity. If there is also a Co-Applicant, it must be a PHA, a local government, a tribal entity, or the owner of the target HUD-assisted housing (e.g. a nonprofit or for-profit developer).

Statutory and Regulatory Changes Made Since 2016

HOTMA CHANGES

On July 29, 2016, President Obama signed into law the “Housing Opportunity Through Modern-

ization Act” (HOTMA). This law made changes to the public housing and voucher programs. The major public housing changes are:

Income Determination and Recertification (HOTMA Section 102)

- For residents already assisted, rents must be based on a household’s income from the prior year. For applicants for assistance, rent must be based on estimated income for the upcoming year.
 - ◀ A PHA may determine a household’s income, before applying any deductions, based on income determination made within the previous 12-month period using the income determination made by other programs, such as Temporary Assistance for Needy Families (TANF), Medicaid, the Supplemental Nutrition Assistance Program (SNAP), the Supplemental Nutrition Program for Women, Infants, and Children (WIC), the Earned Income Tax Credit (EITC), Supplemental Security Income (SSI), and the Low Income Housing Tax Credit (LIHTC).
- A household may request an income review any time their income or deductions are estimated to decrease by 10%.
 - ◀ A PHA has the discretion to set a lower percentage threshold.
 - ◀ Rent decreases are to be effective on the first day of the month after the date of the actual change in come – meaning the rent reduction is to be applied retroactively.
- A PHA must review a household’s income any time that income with deductions is estimated to increase by 10%, except that any increase in earned income cannot be considered until the next annual recertification.

INCOME DEDUCTIONS AND EXCLUSIONS (HOTMA SECTION 102)

- The Earned Income Disregard was eliminated; it used to disregarded certain increases in earned income for residents who had been unemployed or were receiving welfare.

- When determining income:
 - ◀ The deduction for elderly and disabled households increased to \$525 (up from \$400) with annual adjustments for inflation (this became effective January 1, 2024).
 - ◀ The deduction for elderly and disabled households for medical care (as well as for attendant care and auxiliary aid expenses for disabled members of the household) used to be for such expenses that exceeded 3% of income. HOTMA limits the deduction for such expenses to those that exceed 10% of income.
 - ◀ The dependent deduction remains at \$480 but will be indexed to inflation; it applies to each member of a household who is less than 18 years of age and attending school, or who is a person 18 years of age or older with a disability (became effective January 1, 2024).
 - ◀ The deduction of anticipated expenses for the care of children under age 12 that are needed by a caretaker to seek or maintain employment or education is unchanged.
 - ◀ Any expenses related to aiding and attending to veterans is excluded from income.
 - ◀ Any income of a full-time student who is a dependent is excluded from income, as are any scholarship funds used for tuition and books.
 - ◀ If a household is not able to pay rent, a PHA has the discretion to establish policies for determining a household's eligibility for general hardship relief for the health and medical care expense deduction and for the child-care expense hardship exemption.
 - ◀ PHAs may adopt additional deductions (called "permissive deductions") for public housing residents.

Over-Income Limit (HOTMA Section 103)

If a household's income exceeds 120% of AMI for two consecutive years, a PHA must either:

- Terminate the household's tenancy within six months of the household's second income determination, or
- Charge a monthly rent equal to the greater of the Fair Market Rent (FMR) or the amount of the monthly operating and capital subsidy provided to the household's unit.

Asset Limits (HOTMA Section 104)

- To be eligible for public housing assistance, a household must not own real property that is suitable for occupancy as its residence or have assets greater than \$100,000 (adjusted for inflation each year). However, PHAs have the discretion to not enforce these asset limits.
 - ◀ There are a number of things that do not count as "assets" and instead are considered "necessary personal property" such as a car needed for everyday use, furniture, appliances, personal computer, etc.
 - ◀ So-called "non-necessary personal items" that have a combined value less than \$50,000 are excluded from calculating household assets.
 - ◀ Also exempt are retirement savings accounts.
 - ◀ A household may self-certify that it has assets less than \$50,000 (adjusted for inflation each year).

Other Provisions

- A PHA may transfer up to 20% of its Operating Fund appropriation for eligible Capital Fund uses.
- PHAs may establish replacement reserves using Capital Funds and other sources, including Operating Funds (up to the 20% cap), as long as the PHA Plan provides for such use of Operating Funds.

HUD issued a [final rule on July 26, 2018](https://bit.ly/4itO195): <https://bit.ly/4itO195> implementing the 120% over-income limit. HUD issued [Notice PIH 2018-19](https://bit.ly/3EDhQ9m): <https://bit.ly/3EDhQ9m> implementing HOTMA's minimum heating standards on November 2, 2018. On September 17, 2019, HUD [proposed HOTMA implementation regulations and NLIHC summarized](https://bit.ly/2IXFvJ6): <https://bit.ly/2IXFvJ6> key provisions of the proposed changes.

A [final rule](https://bit.ly/3GqCjie): <https://bit.ly/3GqCjie> implementing the income and asset provisions was published in the *Federal Register* on February 14, 2023. [Notice PIH 2023-27/H 2023-10](https://bit.ly/4iyBKQK): <https://bit.ly/4iyBKQK> was posted on September 29, 2023 and revised on February 2, 2024 providing detailed guidance for implementing the final rule provisions. [Notice PIH-2023-03](https://bit.ly/42K4mR7): <https://bit.ly/42K4mR7> provides more guidance on implementing the over-income provisions, detailing the notifications that a PHA must provide to households if they are about to be over-income or have continued to be over-income after 12 months and after 24 months.

On September 18, 2024, PIH sent an [email to PHAs](https://bit.ly/3EDodcL): <https://bit.ly/3EDodcL> informing them that they would not have to comply with the income and asset provisions of HOTMA on January 1, 2025 because PIH's new Housing Information Portal (HIP) was not ready (HIP is intended to replace PIH's IMS/PIC system to accommodate HOTMA changes). The email informed PHAs that PIH will issue guidance on additional HOTMA provisions that can be implemented, and that in the meantime, PHAs should refer [FAQs](https://bit.ly/3EG0Wa9): <https://bit.ly/3EG0Wa9> for provisions that currently may be implemented and guidance related to updating Admission and Continued Occupancy Policies (ACOPs) and Administrative Plans.

The National Housing Law Project updated its "[Quick Reference Guide to Implementation of Title I of the Housing Opportunity Through Modernization Act \(HOTMA\)](https://bit.ly/3Ry2iXn)": <https://bit.ly/3Ry2iXn> on November 19, 2024.

THE NATIONAL STANDARDS FOR PHYSICAL INSPECTION OF REAL ESTATE (NSPIRE)

The National Standards for Physical Inspection of Real Estate (NSPIRE) is a protocol intended to align, consolidate, and improve the physical inspection regulations that apply to multiple HUD-assisted housing programs ([24 CFR part 5 Subpart G](https://www.ecfr.gov/current/title-24/chapter-I/subchapter-B/part-5/subpart-G): <https://bit.ly/4iAuhAK>). NSPIRE replaces the Uniform Physical Condition Standards (UPCS) developed in the 1990s, and it absorbs much of the Housing Quality Standards (HQS) regulations developed in the 1970s. NSPIRE physical inspections focus on three areas: the housing units where HUD-assisted residents live, elements of their building's non-residential interiors, and the outside of buildings, ensuring that components of these three areas are "functionally adequate, operable, and free of health and safety hazards."

NSPIRE applies to all HUD housing previously inspected by HUD's Real Estate Assessment Center (REAC), including Public Housing and Multifamily Housing programs such as Section 8 Project-Based Rental Assistance (PBRA), Section 202 Supportive Housing for the Elderly, Section 811 Supportive Housing for Persons with Disabilities, and FHA Insured multifamily housing. NSPIRE also applies to HUD programs previously inspected using the Housing Quality Standards (HQS) regulations: the HCV program (including Project-Based Vouchers, PBVs) and the programs administered by the Office of Community Planning and Development (CPD) – HOME Investment Partnerships (HOME), national Housing Trust Fund (HTF), Housing Opportunities for Persons with AIDS (HOPWA), Emergency Solutions Grants (ESG), and Continuum of Care (CoC) homelessness assistance programs.

HUD published a [final rule](https://www.govinfo.gov/content/pkg/FR-2023-05-11/pdf/2023-09693.pdf): <https://www.govinfo.gov/content/pkg/FR-2023-05-11/pdf/2023-09693.pdf> implementing the National Standards for Physical Inspection of Real Estate (NSPIRE) in the *Federal Register* on May 11, 2023. The new

inspection protocol started on July 1, 2023 for public housing and on October 1, 2023 for the various programs of HUD's Office of Multifamily Housing Programs, such as PBRA, Section 202 and Section 811. The Housing Choice Voucher (HCV) and Project-Based Voucher programs as well as the CPD programs will not need to implement the NSPIRE changes until October 1, 2025 (postponed from October 1, 2024).

HUD has published three "Subordinate Notices" that supplement the final rule addressing NSPIRE "standards," "scoring," and "administration." The intent of issuing the subordinate notices instead of incorporating their content in regulation is to enable HUD to more readily provide updates as appropriate.

For more information about NSPIRE, see the *National Standards for Physical Inspection of Real Estate (NSPIRE)* article in this *Advocates' Guide*.

STREAMLINING RULE

A final "streamlining rule": <https://bit.ly/42Y-siS6> was published on March 8, 2016, implementing provisions of the "FAST Act". Key public housing provisions include:

- PHAs have the option of conducting a streamlined income determination for any household member who has a fixed source of income (such as Supplemental Security Income, SSI). If that person or household member with a fixed income also has a non-fixed source of income, the non-fixed source of income is still subject to third-party verification. Upon admission to public housing, third-party verification of all income amounts will be required for all household members. A full income reexamination and redetermination must be performed every three years. In between those three years, a streamlined income determination must be conducted by applying a verified cost of living adjustment or current rate of interest to the previously verified or adjusted income amount.

- PHAs have the option of providing utility reimbursements on a quarterly basis to public housing residents if the amounts due were \$45 or less. PHAs can continue to provide utility reimbursements monthly if they choose. If a PHA opts to make payments on a quarterly basis, the PHA must establish a hardship policy for tenants if less frequent reimbursement will create a financial hardship.
- Public housing households may now self-certify that they are complying with the community service requirement. PHAs are required to review a sample of self-certifications and validate their accuracy with third-party verification procedures currently in place.
- Many of the requirements relating to the process for obtaining a grievance hearing and the procedures governing the hearing were eliminated.

SMOKE FREE PUBLIC HOUSING

A final "smoke free" rule: <https://bit.ly/3S3uxxh> was published on December 5, 2016. PHAs had to design and implement a policy prohibiting the use of tobacco products in all public housing living units and interior areas (including but not limited to hallways, rental and administrative offices, community centers, daycare centers, laundry centers, and similar structures), as well as at outdoor areas within 25 feet of public housing and administrative office buildings (collectively referred to as "restricted areas"). PHAs may, but are not required to, further limit smoking to outdoor designated smoking areas on the grounds of the public housing or administrative office buildings to accommodate residents who smoke. These areas must be outside of any restricted areas and may include partially enclosed structures. PHAs had until August 2018 to develop and implement their smoke-free policy. PIH has a public housing smoke-free housing [webpage: https://bit.ly/4iCoRW3](https://bit.ly/4iCoRW3).

CARBON MONOXIDE DETECTORS

“The Consolidated Appropriations Act of 2021” required Carbon Monoxide (CO) alarms or detectors to be installed in each public housing unit, as well as other HUD-assisted properties, by December 27, 2022. HUD issued joint [Notice PIH 2022-01/H 2022-01/OLHCHH 2022-01: https://bit.ly/4iAB7Gh](https://bit.ly/4iAB7Gh) clarifying that it will enforce this requirement. PHAs may use either their Operating Funds or Capital Funds to purchase, install, and maintain CO alarms or detectors. In addition, the act provided a set-aside in the Capital Fund Program that PHAs can compete for to secure additional funds for CO alarms or detectors.

Funding

For FY25, the Administration requested \$3.228 billion for the Capital Fund and \$5.228 billion for the Operating fund. As *Advocates’ Guide* went to press, Congress had not passed an FY25 appropriation’s act; a short-term Continuing Resolution (CR) keeps public housing funding at FY24 levels until further congressional action.

Congress appropriated \$3.410 billion for the Capital Fund and \$5.501 billion for the Operating Fund for FY24; \$3.380 billion for the Capital Fund and \$5.134 billion for the Operating Fund in FY23; and \$3.388 billion for the Capital Fund and \$5.064 billion for the Operating Fund in FY22; \$2.9 billion for the Capital Fund and \$4.9 billion for the Operating Fund in FY21; and \$2.9 billion for the Capital Fund and \$4.5 billion for the Operating Fund in FY20.

Forecast for 2025

The 2024 election resulted in a sweep for Republicans, who will control the House, Senate, and White House in 2025 and 2026. It is difficult to predict the impact for public housing as *Advocates’ Guide* goes to press; however, in the immediate period after the November 5, election proposed appointees to the second Trump

Administration expressed ideas to aggressively cut federal spending. There was even discussion of eliminating some federal departments, although HUD was not specifically mentioned.

PIH [published: https://bit.ly/4iwYznQ](https://bit.ly/4iwYznQ) on November 4, 2024 proposed changes to the Public Housing Assessment System (PHAS) regulations (24 CFR part 902: <https://bit.ly/3Ry6er5>). PHAS is a tool PIH uses to assess how public housing agencies (PHAs) manage their public housing. The preamble to the proposed rule states that the proposed changes would revise the weight of the PHAS “indicators” to emphasize the importance of public housing occupancy, financial condition, and physical assessments. However, it is not clear how greater weight might be given for the importance of physical assessments. PIH specifically requested comments on ten topics. Comments were due January 3, 2025. See NLIHC [November 12, 2024 Memo to Members article](#) for a summary.

HUD released on April 10 a [proposal to update existing screening regulations: https://bit.ly/42MFsjU](https://bit.ly/42MFsjU) for applicants to public housing and other HUD-assisted housing who have conviction histories or a history of involvement with the criminal-legal system. Under current policy, PHAs and landlords of HUD-assisted housing have broad discretion in evaluating current and prospective tenants. As a result, some PHAs and landlords have created additional barriers for people with conviction and arrest records in need of stable housing. These barriers can make it exceedingly difficult – and, for some with conviction histories, impossible – to obtain housing. Among other changes, the proposal would:

- Clarify the types of “relevant criminal activity” for which PHAs and owners can screen.
- Limit lookback periods in admissions decisions to no more than three years before an application.
- Mandate an individualized assessment of rental applicants with a conviction history in admissions decisions.

- Restrict the use of arrest records and ban the use of arrest records as the sole basis for housing denial or eviction.
- Clarify the standard of proof for eviction and termination decisions based on criminal activity.
- Better regulate third-party screening services and companies.

Comments were due June 10, 2024. As of the date this *Advocates' Guide* went to press, a final rule had not been published.

What to Say to Legislators

Advocates should ask Members of Congress to:

- Maintain and increase funding for the public housing Operating and Capital Funds.
- Support public housing as a way to end all types of homelessness.

For More Information

NLIHC, 202-662-1530, www.nlihc.org.

NLIHC's Public Housing webpage, <https://bit.ly/36UfpLU>.

National Housing Law Project, 415-546-7000, <http://nhlp.org/resourcecenter?tid=34>.

Center for Budget and Policy Priorities, 202-408-1080, <http://www.cbpp.org/topics/housing>.

HUD's Public Housing homepage, https://www.hud.gov/program_offices/public_indian_housing/programs/ph.

HUD's Public Housing Data Dashboard, <https://bit.ly/3S6wk4G>

PD&R's Picture of Subsidized Housing, <https://bit.ly/4iAB79f>

PIH's HOTMA homepage, https://www.hud.gov/program_offices/public_indian_housing/hot-maresources

HUD's HOTMA webpage on HUD Exchange, <https://bit.ly/3EG0Wa9>

HOTMA Resident Fact Sheets on HUD Exchange website, <https://www.hudexchange.info/programs/hotma/hotma-income-and-assets/#resident-resources>

The National Housing Law Project's updated "[Quick Reference Guide to Implementation of Title I of the Housing Opportunity Through Modernization Act \(HOTMA\)](#)"

NLIHC's Summary of September 17, 2019 proposed HOTMA implementation regulations, <https://bit.ly/2kr70dt>.

HUD's Public Housing Occupancy Guidebook, https://www.hud.gov/program_offices/public_indian_housing/programs/ph/mod/guidebook

HUD's Rental Assistance Demonstration homepage, <https://www.hud.gov/RAD>

HUD's Public Housing Repositioning homepage, <https://bit.ly/3YgfGDh>

HUD's Moving to Work demonstration homepage, <https://bit.ly/3RALTbw>

HUD's Moving to Work expansion page, <https://bit.ly/3RALTbw/expansion>

HUD's Choice Neighborhoods homepage, <https://www.hudexchange.info/programs/choice-neighborhoods/>