

PUBLIC HOUSING AGENCY PLAN

By Ed Gramlich, Senior Advisor, NLIHC; updated by Renee Williams, Senior Advisor for Public Policy, NLIHC

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

Year Started: 1998

See Also: For related information, refer to the *Public Housing* and *Consolidated Plan* sections of this guide.

The Public Housing Agency Plan (PHA Plan) is the collection of a public housing agency's key policies (such as admissions policies) and program intentions (such as demolition). This includes a Five-Year Plan and Annual Plan updates. The PHA Plan was meant to ensure local accountability through resident and community participation. However, various administrative and legislative efforts have weakened PHA Plans.

Administration

PHA Plans are created by local public housing agencies (PHAs), with oversight by HUD's Office of Public and Indian Housing (PIH). There are approximately 3,800 PHAs. PHA Plan regulations are at [24 CFR Part 903, Subpart B](https://tr.ee/PFq6HM) (<https://tr.ee/PFq6HM>).

History

The "Quality Housing and Work Responsibility Act of 1998" (QHWRA) established the PHA Plan because of the significant shift of authority to PHAs provided by that law. The PHA Plan was meant to ensure local accountability through resident and community participation opportunities. Resident Advisory Boards (RABs) were also created by QHWRA to ensure participation by public housing residents and voucher-assisted households in the PHA Plan process. One provision of the "Housing and Economic Recovery Act of 2008" (HERA) eliminated the requirement to submit an Annual PHA Plan for PHAs administering fewer than 550 units of public housing and vouchers combined, known as "[Qualified PHAs](https://tr.ee/JNu7uP)" (<https://tr.ee/JNu7uP>) (there

are nearly 2,700 Qualified PHAs) (<https://tr.ee/IWWfGz>). Also in 2008, PIH took administrative action to dilute the information provided to residents and the general public through the PHA Plan template.

Plan Summary

All PHAs must develop Five-Year PHA Plans that describe the overall mission and goals of a PHA regarding the housing needs of low-income households in its jurisdiction. Larger PHAs, called "non-qualified PHAs," must also develop an Annual Plan, which is a gathering of a PHA's program intentions, such as intention to demolish public housing, as well as key policies, such as those relating to admissions, income targeting, rents, and pets. However, these larger PHAs must submit only a [short PHA Plan template](https://tr.ee/3dmapd) (<https://tr.ee/3dmapd>) to HUD each year.

THE 19 REQUIRED PHA PLAN COMPONENTS

- 1. Housing Needs** of extremely low-, very low-, and low-income households, elderly households, households with a member who has a disability, and households on public housing and Section 8 waiting lists.
- 2. Tenant Eligibility, Selection, and Admissions Policies** as well as waiting list procedures, admissions preferences, unit assignment policies, and race and income deconcentration policies.
- 3. Financial Resources** and planned uses of these resources for the upcoming year listed in categories such as operating funds, capital funds, other federal funds, and non-federal funds.
- 4. Rent Determination** including rent policies for tenants, and for landlords receiving vouchers.
- 5. Operations and Management** of facilities, including PHA programs, their organization, and policies governing maintenance (including policies regarding pest infestation).

6. **Grievance Procedures** for residents and applicants.
7. **Capital Improvement Needs** and planned actions for the long-term physical and social health of public housing developments. This should include plans and costs for the upcoming year and a Five-Year Plan.
8. **Demolition and Disposition Plans** that the PHA has applied for, or will apply for, including timetables.
9. **Designation of Public Housing for Elderly or Disabled** identified.
10. **Conversion of Public Housing** to tenant-based vouchers through Section 33 (required conversion) or Section 22 (voluntary conversion) of the “United States Housing Act.”
11. **Homeownership Programs** described, such as Section 8(y) or Section 5(h).
12. **Community and Self-Sufficiency Programs** that aim to improve households’ economic or social self-sufficiency, including those that will fulfill community service requirements. This also refers to a PHA’s Section 3 jobs, training, and contracting efforts.
13. **Safety and Crime Prevention** including coordination with police.
14. **Pet** policy.
15. **Civil Rights** as reflected in a formal pledge that the PHA will comply with the “Civil Rights Act of 1964,” the “Fair Housing Act,” Section 504 of the “Rehabilitation Act,” and the “Americans with Disabilities Act.”
16. **Financial Audit** from the most recent fiscal year.
17. **Asset Management** for long-term operating, capital investment, rehabilitation, modernization, or sale of the PHA’s inventory.
18. **Domestic Violence** activities, services, or programs that prevent or serve survivors of domestic violence, dating violence, sexual assault, or stalking as added by the “Violence Against Women Act of 2005” as amended in 2013 and 2022.
19. **Additional Information** including progress in meeting or deviating from the PHA’s mission and goals as listed in the Five-Year Plan.

MOVING TO WORK (MTW) PHAS

The PHA Plan process is different for Moving to Work (MTW) PHAs.

Each year, the 100 Expansion (or Operations Notice) MTW PHAs are required to submit a [MTW Supplement to the Annual PHA Plan](https://www.hud.gov/sites/dfiles/OCHCO/documents/50075-MTW.pdf) (<https://www.hud.gov/sites/dfiles/OCHCO/documents/50075-MTW.pdf>) as part of the standard PHA Plan process. MTW Expansion PHAs indicate the MTW activities they intend to implement from the list of MTW Waivers provided in the MTW Operations Notice. In 2025, [Notice PIH 2025-18](https://tr.ee/VwaiXI) (<https://tr.ee/VwaiXI>) announced that the “MTW Supplement” that the Expansion PHAs have been using would need to be submitted to HUD via a web-based form. The 2025 notice announces that the MTW Supplement, [HUD-50075-MTW](https://tr.ee/Kh3I6U) (<https://tr.ee/Kh3I6U>), has been added “to the collection of PHA Plan templates.” Notice PIH 2025-18 is discussed further below.

The 39 “original” Moving to Work (MTW) PHAs do not submit a PHA Plan. Instead, they have a “MTW Standard Agreement” that requires the PHA to include any planned new MTW initiatives in an Annual MTW Plan which must be approved by PIH before implementing any new initiatives. The original MTW Agencies must provide information on the items listed in Attachment B (<https://tr.ee/bgeCJ3>) of the MTW Agreement in their Plan, which includes evaluation metrics and descriptions of anticipated impacts.

A list of [MTW agencies with HUD contacts](https://tr.ee/teUgpC) (<https://tr.ee/teUgpC>) (as of February 26, 2025) is available. Another link with information about MTW agencies is no longer operational, but an [archived version can be found here](https://tr.ee/aAjXWQ) (<https://tr.ee/aAjXWQ>) for historical purposes (archived March 27, 2025; last updated November 5, 2024). [HUD Exchange](https://tr.ee/EfhJ8N) (<https://tr.ee/EfhJ8N>) has MTW resources as well.

See the Moving to Work Demonstration entry in Chapter 4 of this *Advocates’ Guide*.

RESIDENT ADVISORY BOARDS

As part of this planning process, PHAs are required to have at least one Resident Advisory Board (RAB) to assist in the development of the PHA Plan and any

significant amendments to the Plan. RAB membership must adequately reflect and represent residents served by the PHA, including voucher holders if they make up at least 20% of all those assisted.

To ensure that RABs can be as effective as possible, a PHA must provide reasonable means for RAB members to become informed about programs covered by the PHA Plan, communicate with residents in writing and by telephone, hold meetings with residents, and obtain information through the Internet.

A PHA must consider RAB recommendations when preparing a final PHA Plan or any significant amendment. A copy of the RAB's recommendations and a description of whether those recommendations were addressed must be included with the final PHA Plan.

Notice PIH 2025-18 cites a [HUD Exchange webpage with resources for RABs \(https://tr.ee/psJs3A\)](https://tr.ee/psJs3A). The link for the Resident Advisory Board (RAB) webpage on HUD's main website is no longer operational, but [an archived version is linked to here for historical purposes \(https://tr.ee/BMEtE1\)](https://tr.ee/BMEtE1) and may not contain current information (archived March 11, 2025).

RESIDENT AND COMMUNITY PARTICIPATION

The law and regulations provide for a modest public participation process. A PHA must conduct reasonable outreach to encourage broad public participation. A PHA's board of commissioners must invite public comment regarding a proposed PHA Plan and conduct a public hearing to discuss the plan. The hearing must be held at a location convenient to PHA residents. At least 45 days before the public hearing, the PHA must publish a notice indicating the date, time, and location of the public hearing. Non-Qualified PHAs must also inform the public that the proposed PHA Plan, required attachments, and other relevant information is available for public inspection at the PHA's main office during normal business hours. Notice from Qualified PHAs must make information relevant to any changes in the PHA's goals, objectives, or policies available for public inspection at the PHA's main office during normal business hours.

The final, HUD-approved PHA Plan, along with required attachments and other related documents, must be available for review at the PHA's main office during normal business hours. Small PHAs, those with fewer than 250 public housing units and any number of Housing Choice Vouchers (HCVs) submitting so-called streamlined Annual PHA Plans must certify that any revised policies and programs are available for review at the PHA's main office during normal business hours.

There are four places in the regulations indicating that writing and calling PIH to raise concerns about the PHA Plan might secure attention and relief from PIH:

1. If a RAB claims in writing that a PHA failed to provide adequate notice and opportunity for comment, PIH may make a finding and hold up approval of a PHA Plan until this failure is remedied.
2. Before approving a PHA Plan, PIH will review "any... element of the PHA's Annual Plan that is challenged" by residents or the public.
3. PIH can decide not to approve a PHA Plan if the Plan or one of its components:
 - Does not provide all the required information.
 - Is not consistent with information and data available to PIH.
 - Is not consistent with the jurisdiction's Consolidated Plan.
4. To ensure that a PHA complies with all of the policies adopted in its PIH-approved PHA Plan, "HUD shall, as it deems appropriate, respond to any complaint concerning PHA noncompliance with the plan...HUD will take whatever action it deems necessary and appropriate."

SIGNIFICANT AMENDMENTS

A PHA Plan must identify a PHA's basic criteria for determining what makes an amendment significant. "Significant Amendments" can only take place after formal adoption by a PHA's board of commissioners at a meeting open to the public and after subsequent approval by HUD. Significant Amendments are subject

to all RAB and public participation requirements discussed above.

All year long advocates should be on the lookout for significant amendments to the PHA Plan because any policy or program in it can be modified. Advocates and residents should review the PHA Plan's criteria defining Significant Amendments and work to change them if they are written so that few modifications would be judged significant and therefore escape the RAB and public participation requirements.

Notice PIH 2025-18 notes that Significant Amendment procedures apply when HUD "publishes a new rule and guidance directing PHAs update their Administrative Plans or Admissions and Continued Occupancy Policy (ACOPs) with certain discretionary policy decisions, and those policies are considered significant amendments." Administrative Plans detail a PHA's voucher policies, whereas ACOPs outline a PHA's public housing policies. Revisions to ACOPs and Administrative Plans provide residents with an important avenue for advocacy, as these documents contain a PHA's day-to-day policies, including policies where the PHA is exercising its discretion.

MAJOR CHANGES SINCE 2008

Congress weakened the usefulness of the PHA Plan with changes made in the "Housing and Economic Recovery Act of 2008" (HERA). This law included a provision greatly diminishing PHA Annual Plan requirements for PHAs that administer fewer than 550 units of public housing and vouchers combined. In 2020 there were nearly 2,700 so-called "Qualified PHAs." This means that about 70% of the nation's PHAs were exempt from developing an Annual Plan. Qualified PHAs only need to certify that they are complying with civil rights law and that their Five-Year PHA Plan is consistent with the local or state government's Consolidated Plan. Qualified PHAs must still hold a public hearing annually regarding any proposed changes to a PHA's goals, objectives, or policies. They must also have RABs and respond to RAB recommendations at the public hearing. PIH has a [Qualified PHA webpage \(https://tr.ee/pawyCR\)](https://tr.ee/pawyCR).

PIH also took action in 2008 that weakened the usefulness of the PHA Plan for larger PHAs. Previously,

PIH required PHAs to use a computer-based PHA Plan template. The template was a helpful outline of all PHA Plan components required by the law. But PIH drastically diminished the template in 2008, reducing it from a helpful 41-page, easy-to-access electronic guide, to a mere page-and-a-half-long form, making it much more difficult for residents and the public to know what the law requires and what changed at the PHA during the previous year.

The 2008 PHA Plan template made it more difficult for residents and others to understand the PHA Plan process, engage in it, and have access to information associated with the 19 statutorily required PHA Plan components. The template merely asked PHAs to indicate which of the components were revised, not how the components were revised. Also, there was no longer a list of required plan components prompting residents and others to proactively recommend their own revisions to an Annual Plan.

After proposing changes to the 2008 template in 2011 and 2012, PIH issued Notice PIH 2015-18 announcing four final revised PHA Plan templates. These templates included several modest improvements over the streamlined PHA Plan in use since November 2008; however, they were still far less helpful for residents and advocates than the pre-2008 template. Additional revisions to the four PHA Plan templates were made in 2022.

In 2025, HUD published Notice PIH 2025-18, which supersedes PIH 2015-18 and adds the MTW Supplement as a fifth PHA Template.

As of 2025, HUD now has five types of Annual PHA Plan templates to be used for different categories of PHAs.

- **HUD-50075-ST (<https://tr.ee/nGibWu>) for Standard PHAs and Troubled PHAs.** A Standard PHA owns or manages 250 or more public housing units and/or any number of vouchers for a combined total of more than 550. The PHA was designated "standard" in its most recent assessments for the Public Housing Assessment System (PHAS) and/or Section Eight Management Assessment Program (SEMAP). A Troubled PHA has an overall PHAS or SEMAP Score of less than 60%.

- **HUD-50075-HP** (<https://tr.ee/xdAgiR>) for **High Performer PHAs**. A High-Performer PHA owns or manages any number of public housing units and any number of vouchers, for a combined total of more than 550, and the PHA was designated a “high performer” in its most recent assessments for PHAS and SEMAP.
- **HUD-50075-SM** (<https://tr.ee/kUJLo0>) for **Small PHAs**. A Small PHA owns or manages fewer than 250 public housing units and any number of vouchers, for a combined total of more than 550, and the PHA was not designated as troubled in the most recent PHAS or SEMAP assessment.
- **HUD-50075-HCV** (<https://tr.ee/fgX9Vv>) for **HCV Only PHAs**. A Housing Choice Voucher (HCV)-only PHA does not own or operate any public housing units but does administer more than 550 vouchers, and the PHA was not designated as troubled in its most recent SEMAP assessment.
- **HUD-50075-MTW** (<https://tr.ee/HbewKM>) for **MTW PHAs**. As noted above, this MTW Supplement template is used by the MTW Expansion PHAs.

Per Notice PIH 2025-18, a “Qualified PHA” is one that “administers 550 or fewer public housing dwelling units and/or HCVs combined and is not designated as a Troubled PHA in the most recent Public Housing Assessment System (PHAS) assessment, the most recent Section Eight Management Assessment Program (SEMAP) score and most recent Small Rural Assessment.” Qualified PHAs are not required to complete and submit an Annual PHA Plan. However, Qualified PHAs must submit a Five-Year PHA Plan.

Previously, the PHA Plan template for the Five-Year PHA Plan and the Annual Plan were the same. Notice PIH-2015-18 introduced a separate template for the Five-Year PHA Plan to be used by all PHAs. The latest version of the [Five-Year PHA Plan template](https://www.hud.gov/sites/dfiles/OCHCO/documents/HUD-50075-5Y.pdf) (<https://www.hud.gov/sites/dfiles/OCHCO/documents/HUD-50075-5Y.pdf>) is available on HUD’s website.

THE CURRENT TEMPLATES

In 2025, HUD made additional changes to the PHA Plan templates with the issuance of Notice PIH 2025-18; as noted above, HUD also identified the MTW

Supplement PHA Template as an additional template. Here, the current templates are described generally (though individual templates vary). NLIHC’s more detailed description of the 2025 changes [can be found here](https://tr.ee/uqfbax) (<https://tr.ee/uqfbax>). Advocates should note that because of the many recent changes to the HUD website, hyperlinks included in the templates may no longer be operational.

The four non-MTW templates clearly state that each of the following must be made readily available to the public: a proposed PHA Plan, each of the statutorily required PHA Plan elements, all information relevant to the public hearing about a proposed PHA Plan, and the proposed PHA Plan itself. The non-MTW templates also require PHAs to indicate where the public can access that information. At a minimum, PHAs are required to post PHA Plans at each Asset Management Project (public housing developments or a group of developments) and at the PHA’s main office. PHAs are strongly encouraged to post PHA Plans on their official websites and provide copies to resident councils. The PIH website does not have links to individual PHA Plans. For the MTW Supplement, PHAs must certify the availability of the MTW Supplement and accompanying attachments to the public.

In the section titled “Revision of Existing PHA Plan Elements,” the non-MTW templates list key statutorily required PHA Plan elements (for example, rent determination policies or grievance procedures in the Standard PHA Template), with boxes to check if a change has been made. PHAs that check boxes must then describe the identified revisions.

The non-MTW templates have a “New Activities” section for a PHA to indicate whether it intended to undertake a new activity, such as project-basing vouchers, converting public housing units under the Rental Assistance Demonstration (RAD), demolishing or selling public housing developments, or undertaking a mixed-finance project. Any new activities must be described.

The non-MTW templates require PHAs to include any comments received from the RAB, along with the PHA’s analysis of the RAB’s comments and a description of the PHA’s decision regarding RAB comments. The MTW Supplement template also requires that RAB comments

be attached, accompanied by a discussion of how RAB comments were considered.

The non-MTW templates require PHAs to include information about any challenged element of the PHA Plan, including a description of the challenge, the source of the challenge, and the PHA's public response.

Regarding the Violence Against Women Act (VAWA), only the Standard PHA Plan Template mentions VAWA in the instructions regarding any revision to an existing PHA Plan element, specifically the "Safety and Crime Prevention" element. The MTW Supplement template lists VAWA among other statutes in the MTW Certifications of Compliance.

Perhaps the most significant substantive change regarding the 2025 non-MTW template updates is the removal of most references to affirmatively furthering fair housing (AFFH) from both the templates and the instructions. For the four non-MTW templates, the single AFFH reference to AFFH is a reference to certification, consistent with HUD's March 2025 [interim final rule](https://tr.ee/Z5uuuD) (<https://tr.ee/Z5uuuD>) that significantly scaled back the AFFH certification requirement. See the *Affirmatively Furthering Fair Housing* article.

Ongoing Concerns

NLIHC remains concerned that resident involvement in the PHA Plan will continue to diminish due to the loss of guidance in the PHA Plan template. The template still has few reminders about the role of the RAB in developing the PHA Plan. The template no longer includes the list of RAB members or residents on the PHA Board, nor does it include a description of the process for electing residents to the PHA board.

NLIHC is also concerned that PIH no longer posts a directory of approved PHA Plans by state. PIH should resume posting PHA Plans on its website.

PHA Annual Plans should be enhanced to provide additional data on:

- The number of Annual Contributions Contract (ACC) units a PHA has, by development, the occupancy level at each development, and a plan to reduce any development's vacancy rate that is above 3%.

- The number of ACC units planned for redevelopment that will no longer be available or affordable to extremely low-income households.
- The number of authorized housing vouchers that a PHA has under lease.
- A PHA's SEMAP ratings, any audits of the PHA performed by HUD, and any corrective action the PHA took regarding SEMAP or audit findings.

In addition, NLIHC thinks that more PHAs must be required to comply with the PHA Plan so that residents and community members can have an opportunity to learn about and participate in the decisions affecting the nation's investments in public housing and vouchers.

Tips for Local Success

Advocates should participate in the development of their local agency's PHA Plan. Find out the date your PHA's PHA Plan is due to HUD; those dates are based on a PHA's fiscal year start dates. Ask your PHA to provide notice well in advance of the required public hearing and ask specifically about proposed changes. Review all PHA Plan components thought to be important and prepare written comments as well as comment at the public hearing. Of particular interest may be a PHA's ACOP and/or Administrative Plan, as those policies govern day-to-day PHA operations.

Work with others, especially residents of public housing, voucher households, and other low-income people in the community to increase participation in the PHA Plan process. All year long advocates should be on the lookout for significant amendments and submit written comments as well as verbal comments at the public hearing required for significant amendments.

What to Say to Legislators

Advocates should let their members of Congress know that:

- The PHA Annual and Five-Year Plans are important, local tools that should be expanded to more PHAs and enhanced to require more information about components important to residents and other community members.

- HUD's diminished template for Annual PHA Plan submission should be returned to its original state.
- HUD should post all PHA Plans on its website as it had in the past.

For More Information

[NLIHC](https://www.nlihc.org/), 202-662-1530, in particular at NLIHC's [Public Housing webpage](https://tr.ee/vY487j) (<https://tr.ee/vY487j>) including an [outline](https://tr.ee/O0mZBO) (<https://tr.ee/O0mZBO>) of resident participation in the PHA Plan process

[HUD PHA Plan webpage](https://www.hud.gov/helping-americans/public-indian-housing-pha-plans) (<https://www.hud.gov/helping-americans/public-indian-housing-pha-plans>)

[HUD list of Qualified PHAs](https://tr.ee/DRSn2u) (<https://tr.ee/DRSn2u>)

HUD had a webpage about nonqualified PHAs, but the link is no longer operational. An [archived link](https://tr.ee/cSCmEg) (<https://tr.ee/cSCmEg>) is provided for historical purposes; please note that the site may not have current information (archived March 13, 2025)