



January 3, 2025

Regulations Division
Office of General Counsel
U.S. Department of Housing and Urban Development
451 7th Street SW, Room 4176
Washington, DC 20410-5000

Via regulations.gov

Re: FR-6356-P-01

Public Housing Evaluation and Oversight: Changes to the Public Housing Assessment System (PHAS) and Determining and Remediating Performance Deficiencies.

The National Low Income Housing Coalition (NLIHC) is dedicated solely to achieving racially and socially equitable public policy that ensures people with the lowest incomes have quality homes that are accessible and affordable in communities of their choice. Our members include state and local housing coalitions, residents of public and assisted housing, nonprofit housing providers, homeless service providers, fair housing organizations, researchers, public housing agencies, private developers and property owners, local and state government agencies, faith-based organizations, and concerned citizens. While our members include the spectrum of housing interests, we do not represent any segment of the housing industry. Rather, we focus on policy and funding improvements for extremely low-income people who receive and those who need federal housing assistance.

NLIHC offers two sets of comments, one pertaining to the proposed changes to the weights given to the Financial Assessment Subsystem (FASS) and the Management Assessment Subsystem (MASS), and one pertaining to the continuing failure to provide a means to measure resident satisfaction and resident participation.

Assign Greater Weight to Physical Condition

NLIHC urges HUD's Office of Public and Indian Housing PIH (PIH) to increase the maximum points for the Physical Assessment Subsystem (PASS) to 50 points instead of retaining its current maximum of 40 points while raising the maximums for FASS and MASS to 30 points each (by increasing each indicator's maximum by five points). The physical condition of public housing units and the common spaces of public housing developments impacts residents most directly and therefore warrants greater PHAS consideration. The new NSPIRE inspection protocols should provide heightened and improved attention to the physical quality of residents' units and their units' immediate surroundings, such as hallways and elevators. PHAs ought to be prompted to pay greater attention to a property's physical condition by an augmented PASS score weight.



Continued Failure to Attempt to Gauge Resident Satisfaction and Involvement

On April 25, 2011 NLIHC submitted comments focused exclusively on the omission of the Resident Assessment Subindicator (RASS) in response to PIH's request for comments regarding interim regulations published on February 23, 2011. Those comments were the product of discussions among public housing leaders from NLIHC's Resident Issues Policy Committee and the Resident Engagement Group convened by the National Housing Law Project.

NLIHC then and now urges PIH to ensure that some manner of gauging residents' satisfaction and participation be restored to the PHAS system. A final rule should have an independent, stand-alone measure of resident satisfaction and resident participation. Furthermore, these important elements should not be embedded as minor points in a management operations indicator as PIH once proposed.

Attached to this comment letter is NLIHC's eleven-page April 25, 2011 comment letter devoted entirely to resident satisfaction and participation as a component of PHAS.

If you have any questions about our comments, please contact Ed Gramlich, Senior Advisor, ed@nlihc.org, 202.662.1530 x 314.

Sincerely,

A handwritten signature in cursive script that reads 'Ed Gramlich'.

Ed Gramlich
Senior Advisor