

Public Housing Assessment Subsystem (PHAS)

24 CFR PART 902



Questions we will answer

- What is PHAS?
- What are the key components ?
- What are the PHAS Indicators?
- How does data become a score?
- How do you ensure the best score for Physical and Management and Operations?
- What are some resources?

What is PHAS?

Public **H**ousing **A**ssessment **S**ystem:

A **tool** to effectively and **fairly assess** how PHAs manage their public housing.

- Designed for **greater accountability**, **improve public housing**, and further **enhance trust** with the public.
- Emphasizes the importance of **public housing occupancy**, **financial condition**, and **physical conditions**.

What are the key components of PHAS ?

24 CFR 902.1 (d)

Criteria

HUD will make use of uniform and objective criteria for the physical inspection of projects and PHAs and the financial assessment of projects and PHAs, and will use data from appropriate agency data systems to assess management operations.

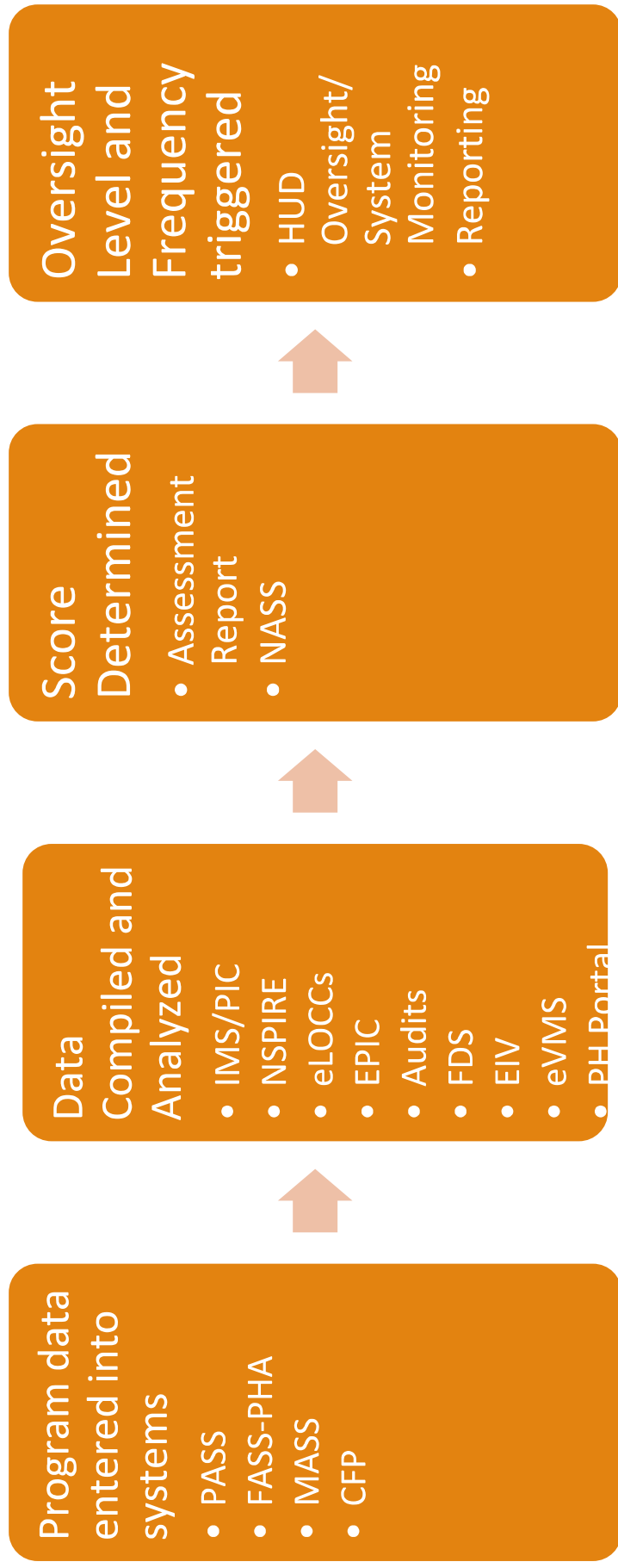
Tools

Data

What are the PHAS Indicators?

- PASS-Physical
- FASS-PH-Financial
- MASS-Management and Operations
- CFP-Capital Fund

How does data become a score?



What are the HUD Systems that Gather Data?

System and SubSystems	Data	System and SubSystems	Data
Secure Systems	Overall HUD systems management	eLOCCS	Manage financial data for PH funding, including Op Fund, CFP, shortfall, other grants
PH Portal	Web Based submission of PHA Performance, Reporting, Funding Requests, waiting list data, annual and five year plans	EPIC	Manage Capital Funds, 5 year action plans, annual statements, grant close out, budgets, and document packages
IMS/PIC	Maintains and gathers data about a PHA's tenants, buildings, units, HA officials, HUD staff, users, secure systems admin, Building and PHA information, Occupancy Data, Errors, Audits, FDS	eVMS	Manage utilization of vouchers
NASS	Compilation, review, and production of the composite PHAS score	FASS-PHA	Audits, Financial Data Sheet, TARs
NSPIRE	Physical Conditions		

Data integrity and Compliance

Source of Data (system/tools)	Impact on Score
IMS/PIC	Reporting of vacancy and use of units, PIC Accuracy/errors, 58 submissions, Occupancy
EPIC	Capital Fund Reporting, Correlation of data on annual statements (expenditures) associated with capital funds and balanced annual statements as compared to eLOCCs
eLOCCS	Funds Management
NSPIRE	Physical Conditions
Single Audit	Timeliness, Accuracy, Governance, compliance with part 200
FDS (Financial Data Schedule)	Timeliness of Submission, Accuracy of Financial Information, Tenant Accounts Receivables, Payables, Debt Service Coverage Ratio

PASS- Physical Assessment Subsystem

*Tracks compliance with **physical condition standards** and **utilizes NSPIRE procedures** to **indicate** a PHA's performance.*

Subpart B—Physical Condition Indicator

Objective:

- Ensure all residents live in **safe, habitable** dwellings, **free** of health and safety hazards
- Ensure interior and exterior **components of the building/units** are functionally **adequate, and operable**
- Based on an **independent inspection** of a PHA's project
- [24 CFR part 5, subpart G](#): NSPIRE Standards and 3-2-1 Rule

<https://www.ecfr.gov/current/title-24/subtitle-B/chapter-IX/part-902/subpart-B>



Impact of the Score

3-2-1 Rule

Score	Inspection Frequency	Rating
Greater than 90	3 years	High Performer
79-89	2 years	Standard and Substandard
Less than 79	1-Annually	Troubled

FASS PHA- Financial Management Assessment Subsystem

FASS-PHA tracks compliance and financial reporting of public housing participants through their annual electronic financial statements.

Subpart C—Financial Condition Indicator

Objective:

- ☐ **Accurate and Timely**
- ☐ Use **financial reporting standards** to assess the PHA’s **financial condition**
- ☐ Scores are **impacted by audited financial** information and meeting **compliance dates** impact assessment
- ☐ **Late** audits or financial reports result in **loss of points** (**Late Presumptive Failure**)

<https://www.ecfr.gov/current/title-24/subtitle-B/chapter-IX/part-902/subpart-C>

Financial Reporting Due Dates

Financial Reporting Due Dates					
Fiscal Year End	9/30	12/31	3/31	6/30	
Unaudited Due Date	11/30	2/28	3/31	8/31	
Unaudited Extension request Deadline	11/15	2/13	5/16	8/16	
Audited Due Date	6/30	9/30	12/31	3/31	

Avoid: Late Financials, Audit Findings or Significant Adjustments to Financial Records

MASS- Management Assessment Subsystem

*Provides an **assessment of a project's**
management effectiveness.*

Subpart D—Management Operations Indicator

Objective:

- **Measure** the PHA's **performance** of management operations of **each project** (Asset Management Project (**AMP**))
- Projects will be **assessed through information** that is electronically **submitted** to HUD **through the FDS** (financial data schedule)
- **Weighted** 25 percent (25 points) of the overall PHAS score

<https://www.ecfr.gov/current/title-24/subtitle-B/chapter-IX/part-902/subpart-D>

Management and Operations Sub Indicators

<u>Sub Indicators</u>	<u>Description</u>	<u>Score/Source of Data</u>
Occupancy	Occupancy for FY Adjusted for Allowable Vacancies	Occupancy Rate <90 = 0 points
Tenant Accounts Receivable (TAR)	Tenant Accounts Receivable for a Project against tenant charges for FY	FDS Financial Statements
Accounts Payable	Money the project owes vendors end of FY-products and services purchase don credit against operating expenses	FDS Financial Statements

Management

Operations

Sub-indicators

CFP – Capital Fund Program

*Provides an **assessment** of a PHA's
ability to obligate Capital Fund
Program funds in a **timely** manner,
and **keep units occupied**.*

Subpart E—Capital Fund Program Indicator


Objective:

- **Examine** the period of time taken to obligate funds and occupy units in relation to **statutory deadlines**
- Measure timely obligation of Capital Funds
- Measure occupancy as of the end of the PHA's fiscal year
- **Advise PHAs** of their scores, and **identify low-scoring and poor-performing** projects and **provide** appropriate attention and assistance

Capital Fund – Sub Indicators

Sub Indicator	Focus Area-Impacting Assessment of PHA performance or Health
eLOCCS	Obligation Deadlines
IMS/PIC	Occupancy Rate

Priority Areas

- Data Integrity and Compliance
 - Keeping Units Occupied
 - Keeping Units and Buildings Decent, Safe, Sanitary
 - Tracking the Money
 - Reporting Timely
- 

**Indicators
and
Practical
Solutions**

Physical Condition

Management Operations

Capital Fund Program

Physical Condition – 40 points!

Amp	2022	2024
001	77/100	92/100
002	50/100	93/100

- Inspection Protocol Changed
- Inspector Dependent
- Huge Point Deduction Losses
- Substandard Physical:
 - project must get at least 24 (60%) of the total points available to receive a “passing” score

What did we do?

Train Staff – Certified

Pre-Inspections

List of Items and Score Impact

- Focus on high impact items

Preventative Maintenance (tracking)

Calculating a Weighted Physical Score

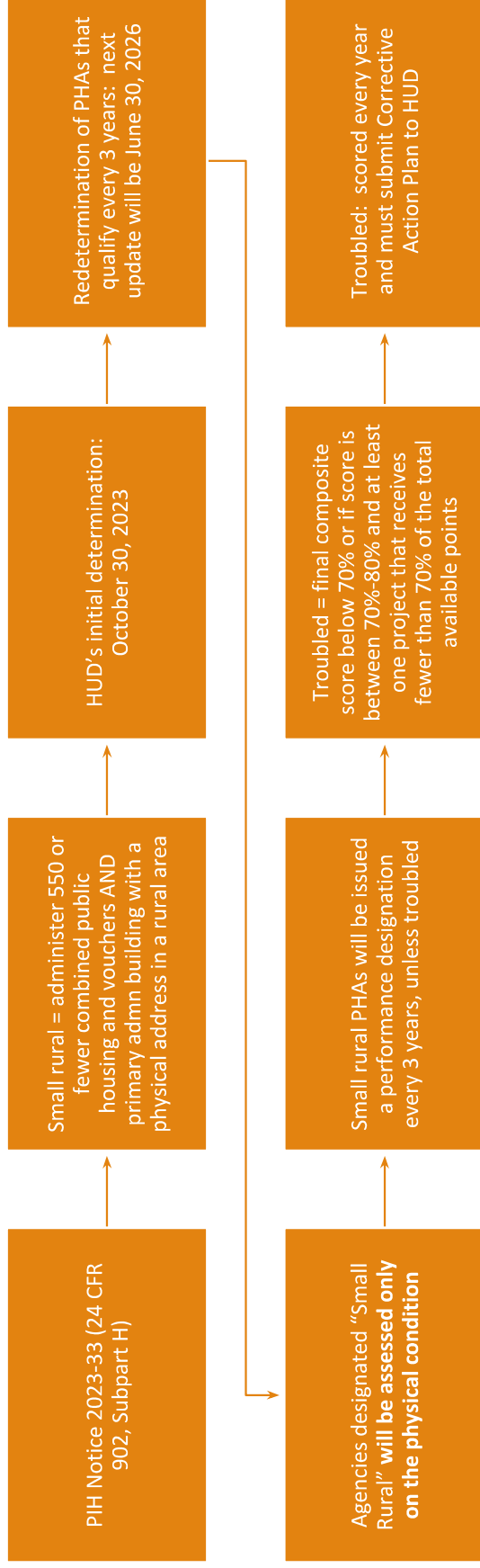
Physical Score	Score	# of units	40 Point Score (score x .40)
AMP 1	83	128	33.2
AMP 2	99	147	39.6
$(\# \text{ of units} \times 40 \text{ pt score}) + (\# \text{ of units} \times 40 \text{ pt score})$			
total # of units			
10070.8			
275			
2026 Weighted Score			36.6

time	Inspection W/O	NS/PRE W/O	Utility Room	COMBO	Smoke D	K-FAUCET	B-Sink	B-Fan	Shower	Outlet	SCREEN	K- Light	I-WINDOW LOCK	EGRESS/ISSUE
\$ -	4691	4839	LOCKED		3	1				3				YES
\$ 230.0	4692	4840	LOCKED	1						2				YES
\$ -	4693	4841	LOCKED							4				NO
\$ -	4694	4842	OPEN	1	2					4				NO
\$ 45.0	4695	4843	LOCKED	1	3					4				YES
\$ 45.0	4696	4844	OPEN	1						1				YES - Bedroom 3
\$ -	4697	4845	OPEN	1	1		1		1	1				YES - Bedroom 2
\$ -	4698	4846	LOCKED	1						1		1		NO
\$ 125.0	4699	4847	LOCKED	1	2	1				1		1		YES - Entrance
\$ 50.0	4700	4892	LOCKED	1	3									Yes Steps
\$ 185.0	4701	4848	OPEN	1	1					1		2	1	YES - Steps
\$ -	4702	4849	LOCKED											NO
\$ 175.0	4703	4893	OPEN	1	2									
\$ 255.0	4704	4850	LOCKED	1	3				1	3		1		NO
\$ -	4705	4851	OPEN	1	2	1								NO
\$ 30.0	4706	4852	OPEN	1	2				1	4				NO
\$ 405.0	4707	4853	LOCKED		1					4		2	1	NO
		4931	LOCKED	1	3									
	4709	4854	OPEN	1	2							1		NO

TURN E2

5-Feb E3

Small Rural Assessments of Public Housing



NSPIRE Appeal

- ❖ Is the Appeal Worth It?
- ❖ Will the Score Change Your Inspection Frequency?
- ❖ Will a Change in Score Affect PHAS?
- ❖ 45 Days to Submit Appeal
- ❖ Adequate Documentation

NSPIRE INSPECTION APPEAL EXAMPLE – EVELETH HRA	
Preliminary Score	30
Final Score	83

MASS Scoring Indicators

Occupancy Rate	16 points
Tenant Accounts Receivable	5 points
Accounts Payable	4 points
Total MASS	25 points

Occupancy Is Counted in Two Areas!

- MASS – 16 Occupancy Points
- Capital Fund – 5 Occupancy Points
- Total PHAS – 21 Occupancy Points

Occupancy Computation – 16 points!

How many units are occupied on the first/last of the month?

Unit Months Leased

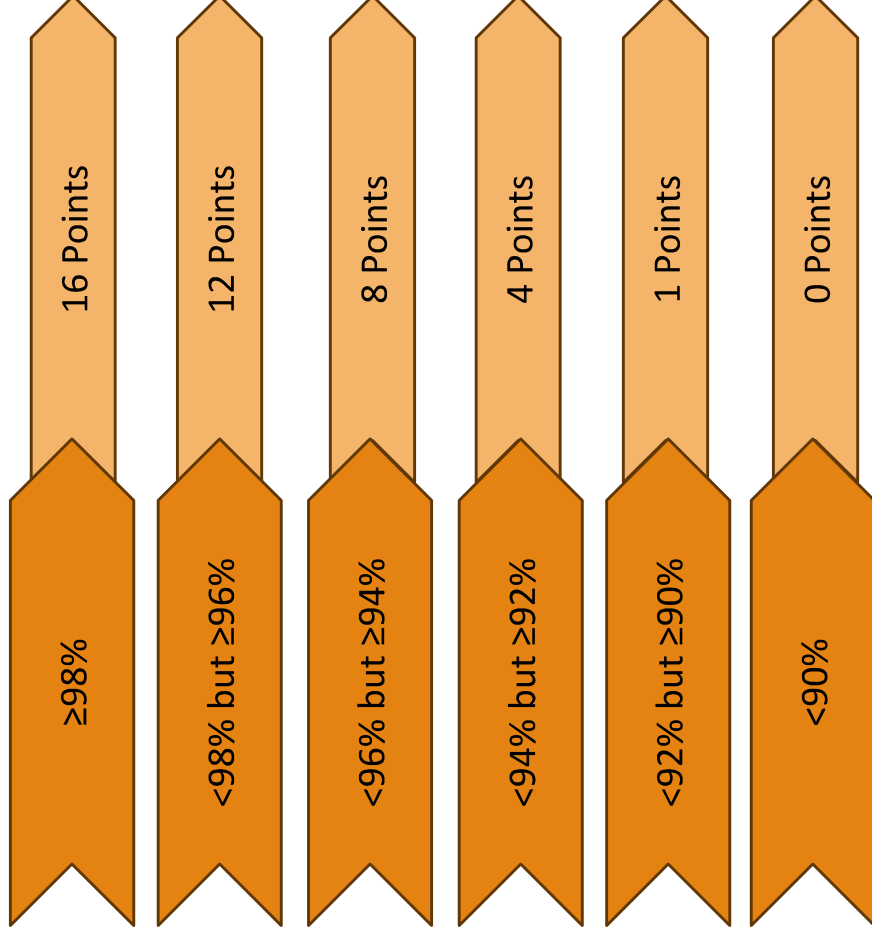
- Numerator

Unit Months Available

- Denominator

WHAT ARE YOUR TARGETS?

How Occupancy is Scored



Maximizing Strategies

ITASCA COUNTY HRA

Occupancy Ratio	Low Rent
FDS 11210 UML	1534
FDS 11190 UMA	1584
Occupancy Ratio	96.84%
Score	Points
>98%	16
<98%>96%	12
<96%>94%	8
<94%>92%	4
<92%<90%	1
<90%	0

- ❖ Weekly meetings: Property Mgmt & Maintenance
- ❖ Processing Applications
 - ❖ Prior to Unit Vacancy
 - ❖ Continuous Processing of Applications
- ❖ Monitor Monthly on Financial Statements
- ❖ Transfer Mid-Month – Not the 1st
- ❖ Keep Units in Good Condition (PM) to Reduce Turnover Time
- ❖ Timing of Move-Out Inspections
- ❖ What is your notice period?
- ❖ How many letters do you send out for each vacancy?

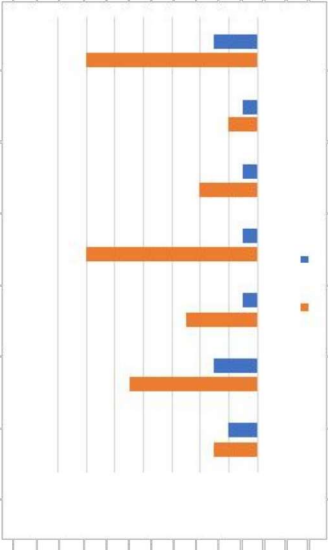
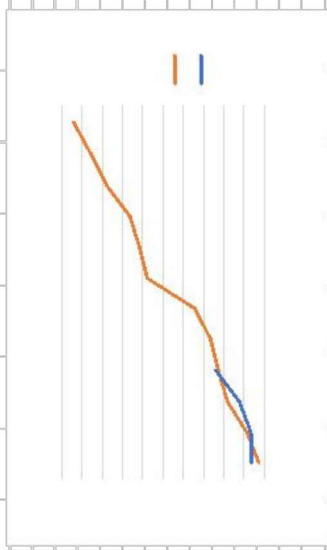
Modernization Requests

How Requests Affect Occupancy Scores

When to Submit a Modernization Request

- Approved Mod Units Are Not □ Within 30 Days of Start Date
- Included in the Numerator or □ Examples of Mod Requests
 - Asbestos
 - Meth Unit
 - Relocation Unit
- Denominator When
- Calculating Occupancy for
- the MASS Indicator

ISP	FPW	401	411	CAL	TAC	CLT	Month Total	Annual Pace
2026								
304 April	215 January	102 April	104 March	C-33	104 January	E2	Jan	3
104 April	115 March			April		E3	Feb	0
	215 April					E1	Mar	3
							Apr	6
							May	0
							Jun	0
							Jul	0
							Aug	0
							Sep	0
							Oct	0
							Nov	0
							Dec	0
Total	2	3	1	1	1	1		
Total								
Avg./Month								
2025 Turns								
ISP	FPW	401	411	CAL	TAC	CLT	Month Total	Annual Pace
322 July	115 April	209 January	348 February	107 March	102 March	I3	Jan	1
108 August	108 July	109 February	109 June	102 May	38 December	C4	Feb	3
302 November	109 July	211 March	344 July	110 May		A1	Mar	5
	105 July	314 April	110 July	104 July		B4	Apr	2
	102 July	216 September	341 August			F2	May	2
	209 September		104 October			F3	Jun	4
	208 October		113 October			I4	Jul	12
	104 October		340 October			J3	Aug	2
	102 October		229 November			A3	Sep	2
			336 November			C4	Oct	6
			347 November			J2	Nov	4
			112 December			K2	Dec	4
Total	3	9	12	4	2			
Total								
Avg./Month								



Tracking Unit Turns

Tenants Accounts Receivable (TAR) – 5 points

- ◆ Not just rent charged, ALL tenant charges
- ◆ Billing AND Collecting is very important

Tenant Accounts Receivable Computation

FDS 126
Accounts Receivable-
Tenants

NUMERATOR

DENOMINATOR

FDS 70500
Total Tenant
Revenue*

*Includes rents and other charges to the tenants

Maximizing Strategies

- ✓ Monitor and Discuss During Weekly Housing Meetings
- ✓ Run TAR Report
- ✓ Need Identified Process for Late Rent Letters and Termination Decisions
- ✓ Write off AR from Past Tenants at YE
- ✓ Little Room for Error

Tenant Accounts Receivable	Low Rent
FDS 126 Tenant Accounts Receivable	4,681.00
FDS 70500 Tenant Rental Revenue	625,553.00
TAR Ratio	0.75%
Score	Points
<1.5%	5
>1.5% but <2.5%	2
>2.5%	0

Accounts Payable (AP) – Max. 4 points

Accounts Payable (AP) Computation

$$\frac{\begin{array}{l} \text{FDS 312} \\ \text{(Current) Accounts} \\ \text{Payable < 90 Days} \end{array} + \begin{array}{l} \text{FDS 313} \\ \text{(Past Due) Accounts} \\ \text{Payable > 90 Days} \end{array}}{\begin{array}{l} \text{FDS 96900} \\ \text{Total Operating} \\ \text{Expenses} \end{array}} = 12$$

How Accounts Payable is Scored

<0.75	4 Points
≥0.75 but <1.5	2 Points
≥1.5	0 Points

Accounts Payable	Low Rent
FDS 312 AP <90 Days	48,812.00
FDS 313 AP >90 Days	-
Numerator Total	48,812.00
FDS 96900 Total Operating Expenditures	802,977.00
Divided by 12	12.00
Denominator total	66,914.75
AP Ratio	0.729
Score	Points
<.75	4
>.75 but <1.5	2
>1.5	0

Maximizing Strategies

- vAnything earned and unpaid at year end must be booked as a payable
- vConstruction in Progress
- vRetainage
- vDon't run up the AP/credit card before the end of the year

Capital Fund Program (CFP) – Timeliness of Fund Obligation (5 points)

The purpose is to obligate 90% or more of funds as quickly as possible, but no later than 2 years after funds become available.

Plan for Use of CFP

Track & Report Obligation End Dates

Easy Points – do not lose them! 5 points or 0 points

When Does Obligation Occur?

BLI 1480

General CFP Work

Upon Contract Execution
e.g. A/E and Construction Contracts

BLI 1406

Operations

Upon Draw Down from eLOCCs

BLI 1408

**Management
Improvements**

Upon Contract Execution

BLI 1410

Administration

When the PHA has the funding budgeted in an approved
Annual Statement and 5-Year Action Plan

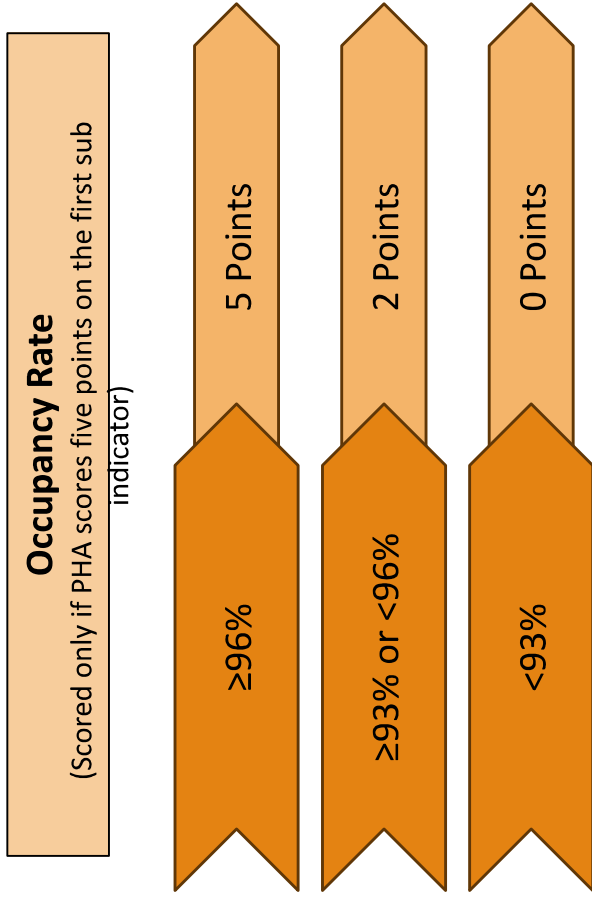
Obligation Extension

- Submitted to Director of Capital Improvements & Field Office – Instruction in Capital Fund Guidebook
- Submit 45 Days Prior to Obligation Date
- Extension Requests Must Meet 24 CFR 905.306 Requirements
 - 12 Month Extension:
 - Size of the PHA
 - Complexity of the CFP
 - Result of State or Local Law
 - Factors HUD Determines Relevant
 - Greater than 12-Month Extension:
 - Litigation
 - Delays in Gov't Approvals
 - Environmental Assessments
 - Abatement Requirements
 - Relocating Residents
 - Event Beyond the Control of the PHA
 - Any Other Reason Established by HUD by Notice in the Fed'l Register

CFP Occupancy Rate— Total 5 points

SCORING

(5 POINTS PROVIDED FUND OBLIGATION IS MET)



OCCUPANCY RATE

This occupancy score is different from MASS.

It is a snapshot and is the same for all PHAs.

Looks at how many units are vacant on the last day of fiscal year.

Approved Mod units count as vacant for this indicator.

PHA Occupancy Percentage Calculations

	IMS/PIC Building and Unit Submodule: Unit Tenant Status Categories and Sub-Categories*	PHAS Management Assessment (MASS)		PHAS Capital Fund		HUD Agency Priority Goal (APG) Reporting	
		Numerator - UML	Denominator - UMA	Numerator	Denominator	Numerator	Denominator
1	Occupied-Assisted Tenant	v	v	v	v	v	v
2	Occupied-Employee	v	v	v	v	v	v
3	Occupied-Non Assisted Tenant Over income	v	v	v	v	v	v
4	Occupied-Police Officer	v	v	v	v	v	v
5	Occupied-Unauthorized		v		v		v
6	Vacant-Undergoing Mod		**		v		v
7	Vacant-Court Litigation		**		v		v
8	Vacant-Natural Disaster		**		v		v
9	Vacant-Casualty Loss		**		v		v
10	Vacant-Market Conditions		**		v		v
11	Non Dwelling-Special Use: Anti Drug Crime			v	v	v	v
	Non Dwelling-Special Use: Self Sufficiency						
12	Activities			v	v	v	v
13	Non Dwelling-Special Use: Other Resident						
	Activities			v	v	v	v
14	Non-Dwelling-Moving to Work			v	v	v	v
15	Non-Dwelling-Administrative		v	v	v	v	v
16	Non-Dwelling-Resident Amenities		v		v		v
17	Non-Dwelling-Unauthorized		v		v		v
18	Demo-Dispo (Approved and vacant)						
19	Vacant/Vacant		v		v		v

* See PIH Notice 2011-07, Guidance on IMS/PIC Development sub-Module Reporting and Validation, on the use of public housing units and unit reporting in IMS/PIC.

**In accordance with the PHAS Interim rule (24 CR part 902), these units are excluded when approved by HUD.

PHAS MASS: PHA fiscal year unit months leased (FDS line 11210) over units months available (FDS line 11190)

PHAS Cap Fund: from PIC as of the last day of the PHA's fiscal year

HUD APG: from PIC for the entire portfolio of PHAs as the date captured/reported

Resources

<https://files.hudexchange.info/resources/documents/PHAS-Training-Introduction-Scoring-Planning-and-Tracking-Slides.pdf>

<https://files.hudexchange.info/resources/documents/PHA-Indicator-Calculations-Worksheet-Instructions.pdf>

https://www.stpha.org/images/public-housing/phas_about.pdf

<https://www.hudexchange.info/trainings/courses/public-housing-assessment-system-training-improving-pha-performance/>

<https://www.hud.gov/contactus/technical-assistance-center>

<https://www.hudexchange.info/trainings/courses/public-housing-assessment-system-training-improving-pha-performance/>

QUESTIONS?

