



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-5000

OFFICE OF PUBLIC AND INDIAN HOUSING

Special Attention:

Public Housing Agencies (PHA)
Public Housing Hub Office Directors
Public Housing Program Center Directors
Regional Directors
Field Office Directors
Resident Management Organizations
Section 8 Housing Agencies

Notice: PIH 2025-18 (HA)

Issued: June 3, 2025

Expires: Effective until amended, superseded, or rescinded

Cross References: 24 CFR Part 902, 24 CFR Part 903, Notice PIH 2008-41 and Notice PIH 2023-33.

Subject: Automation of and Revisions to the Public Housing Agency (PHA) 5-Year Plan and Annual Plan Templates and Certification Forms

I. PURPOSE

This notice supersedes Notice PIH 2015-18 as well as:

- Provides guidance on accessing and submitting the automated public housing agency (PHA) Plans (referred to as the 5-Year Plan and Annual Plan throughout this notice), certifications and associated attachments into the web-based Public Housing Portal.
- Announces the automation of and revisions to the following 5-Year Plan and Annual Plan templates:
 - HUD-50075-5Y
 - HUD-50075-HCV
 - HUD-50075-HP
 - HUD-50075-MTW
 - HUD-50075-SM
 - HUD-50075-ST
- Announces the automation of and revisions to the following certification forms:
 - HUD 50077-CR
 - HUD 50077-SL
 - HUD-50077-CRT-SM
 - HUD-50077-ST-HCV-HP
- Announces the addition of the Moving to Work (MTW) Supplement template to the collection of PHA Plan templates.
- Restates the categories of PHAs and the corresponding 5-Year Plan and Annual Plan submission requirements.

- Incorporates the elements of Project Based Voucher (PBV) activities into both the 5-Year Plan and Annual Plan templates, as described in more detail in Section 4 of this notice.
- Restates and clarifies additional requirements of the PHA planning process as well as the need for local accountability and resident engagement.

II. BACKGROUND AND APPLICABILITY

Section 511 of the Quality Housing and Work Responsibility Act of 1998 (QHWRA), Pub. L. 105–276, created the requirement for submission of the 5-Year Plan and Annual Plan by all PHAs administering the Public Housing and/or Housing Choice Voucher (HCV) programs. Sections 2701 and 2702 of the Housing and Economic Recovery Act of 2008 (HERA), Pub. L. 110-289 relieved burden on small PHAs by providing Qualified PHAs with an exemption from the requirement to submit an Annual Plan (See Section 3 for a definition of Qualified PHAs). Most recently, the Housing Opportunity Through Modernization Act of 2016 – Housing Choice Voucher and Project Based Voucher Implementation Final Rule; Additional Streamlining Changes (HOTMA Voucher Final Rule), published in the Federal Register May 7, 2024 ([89 FR 38304](#)), as corrected on May 28, 2024 ([89 FR 46020](#)), requires PHAs to report certain PBV activities in the 5-Year Plan and Annual Plan. Specifically, if a PHA participates in the PBV program, the PHA's Annual Plan must incorporate a statement of the projected number of project-based units, the general location of the project-based units, and how project-basing would be consistent with its Annual Plan. Additionally, if a PHA intends to select one or more projects for PBVs without competition in accordance with 24 CFR 983.51(c), the PHA must incorporate a statement of this intent in its 5-Year Plan (or an amendment to the 5-Year Plan) to notify the public prior to making a noncompetitive selection.

After the U.S. Department of Housing and Urban Development (HUD) issued Notice PIH 2008-41, it received public comments on earlier versions of the PHA plan templates and forms reviewed by the Office of Management and Budget (OMB) under the Paperwork Reduction Act of 1995. Specifically, several commenters requested that HUD revise the plan templates to accurately reflect existing regulations that permit HUD to establish streamlined plans for small and high-performing PHAs, as well as PHAs that only administer tenant-based assistance (i.e. the HCV Only or Section 8 Only PHAs) and do not own or operate public housing. This led HUD to create three streamlined versions of the standard Annual Plan template: form HUD-50075-HCV, form HUD-50075-HP and form HUD-50075-SM.

In 2015, the Affirmatively Furthering Fair Housing (AFFH) Final Rule required HUD program participants to conduct specific fair housing planning efforts such as the Assessment of Fair Housing (AFH). However, the 2020 Preserving Neighborhood and Community Choice (PNCC) rule rescinded the 2015 AFFH rule, eliminating the requirement for HUD grantees to conduct fair housing planning. On June 10, 2021, HUD published an AFFH interim final rule (IFR) that does not require recipients to conduct a specific form of fair housing planning. Instead, it requires grantees to meaningfully certify

that they are meeting the Fair Housing Act's AFFH obligation, consistent with the definitions in the IFR, and provides a voluntary planning mechanism for recipients to submit fair housing plans separate from a PHA plan. For this reason, a previous section created for PHAs to report on their AFFH goals (Section D) has been removed.

Finally, Section 239 of the [2016 Appropriations Act](#), authorized HUD to expand the Moving to Work (MTW) Demonstration Program by 100 additional agencies between 2016 and 2022. This resulted in the creation of the MTW Supplement which was added to the PHA Plan template collection. The MTW Supplement to the Annual Plan must be submitted by MTW Expansion agencies using a web-based form. MTW Expansion agencies must also continue to submit the 5-Year Plan and the Annual Plan template for which they qualify. Contact your HUD MTW coordinator for additional information about the MTW Supplement form and MTW Supplement system. Initial MTW Agencies (joined the program before 2016) do not submit the Annual Plan and 5-Year Plan templates and should contact their HUD MTW coordinator for instructions on submitting the MTW Annual Plan and Report.

III. PHA CATEGORIES AND RELATED SUBMISSION REQUIREMENTS

PHAs not exempted from the requirement to submit an Annual Plan under HERA are required to submit a complete or streamlined Annual Plan pursuant to the requirements of 24 CFR 903.7, 903.11, and 903.12. The regulations at 24 CFR 903.11 permit PHAs that are high performing or small, or that only administer tenant-based assistance to submit streamlined plans. The definitions of the PHA categories required to submit the 5-Year Plan and Annual Plan are described below:

- **All PHAs** – All agencies administering the public housing program, the HCV program (as well as the PBV program), and Section 8 Moderate Rehabilitation (Mod Rehab) if administering HCV and/or public housing units. All PHAs must submit PHA plans as required by section 5A of the United States Housing Act of 1937 (42 U.S.C. 1437c-1). As a reminder, PHAs with zero public housing units must continue to comply with the PHA Plan requirements until they close out their public housing programs (i.e. Termination of the Public Housing Annual Contributions Contract (ACC)). However, there are a few minor exceptions such as Mod Rehab-only agencies,¹ and non-profit organizations that administer Mainstream vouchers. Per the [Frank Melville Supportive Housing Investment Act of 2010](#), non-profit organizations that administer Mainstream vouchers, are considered PHAs solely as it relates to administering tenant-based rental assistance and thus, are exempt from the requirements of the PHA Plan.

Submission Requirement: All PHAs must submit the 5-Year Plan using the 5-Year Plan template (form HUD-50075-5Y) once every 5 PHA fiscal years, no later than 75 days before the PHA's fiscal year beginning (FYB). For the fiscal year in which the 5-Year Plan is due, the Annual Plan is also due.

¹ This is a rare occurrence and very few agencies will fall into this category.

- **Qualified PHA** – A PHA 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 (See Notice 2023-33).

Submission Requirement: Qualified PHAs must submit the 5-Year Plan using the form HUD-50075-5Y but are not required to complete and submit Annual Plans (see 24 CFR 903.3(c)) except for the Civil Rights Certification (form HUD 50077-CR). Qualified PHAs submit form HUD-50077-CR annually in lieu of an Annual Plan as well as in the year the 5-Year Plan is due. While HERA exempts Qualified PHAs from the requirement to submit an Annual Plan to HUD, Qualified PHAs must still carry out the annual public hearing requirements.

- **Standard PHA** – A PHA that administers 250 or more public housing units and/or any number of vouchers where the total combined units are 551 or more and is designated as a Standard Performer (see 24 CFR 902.11(b)) in the most recent PHAS and/or SEMAP assessments if administering both programs. For PHAs that administer only one program, they must be designated as a Standard Performer in PHAS if only administering public housing or SEMAP if only administering Housing Choice Vouchers.

Submission Requirement: Standard PHAs must submit their Annual Plans using the standard template (form HUD-50075-ST).

- **Troubled PHA** – A PHA that is designated Troubled (see 24 CFR 902.11(d), 902.75 and 902.105) on the most recent PHAS or SEMAP assessments if administering both programs or the Small Rural Assessment if applicable. For PHAs that administer only one program, they would be designated as a Troubled Performer in the Small Rural Assessment, PHAS if only administering public housing or SEMAP if only administering Housing Choice Vouchers.

Submission Requirement: Troubled PHAs must submit their Annual Plans using the standard template (form HUD-50075-ST).

- **High-Performer PHA** – A PHA that administers any number of public housing units and/or any number of vouchers where the total combined units are 551 or more and is designated as a high performer (see 24 CFR 902.11(a)) on the most recent PHAS and SEMAP assessments if administering both programs. Otherwise, PHAS if only administering public housing or SEMAP if only administering Housing Choice Vouchers.

Submission Requirement: High Performer PHAs must submit a streamlined Annual Plan using the high performer template (form HUD-50075-HP).

- **Small PHA** – A PHA (see 24 CFR 902.13(a)) that administers fewer than 250 public housing units and any number of vouchers where the total combined units are 551 or more and is not designated as a Troubled PHA in the most recent PHAS and SEMAP assessment. Small PHAs may also be High Performer PHAs if they meet the definition of High Performer above.

Submission Requirement: Small PHAs must submit a streamlined Annual Plan using the small template (form HUD-50075-SM). Small PHAs that choose to submit as High Performers must submit a streamlined Annual Plan using the high performer template (form HUD-50075-HP).

- **Housing Choice Voucher (HCV) Only PHA** – A PHA (see 24 CFR 903.11(a)(3)) that administers 551 or more HCVs and does not own or manage public housing and is not designated as troubled in its most recent SEMAP assessment. HCV-Only PHAs may also be High Performer PHAs if they meet the definition of High Performer above.

Submission Requirement: HCV-only PHAs must submit a streamlined Annual Plan using the HCV-only template (form HUD-50075-HCV). HCV-Only PHAs that choose to submit as High Performers must submit a streamlined Annual Plan using the high performer template (form 50075-HP).

The table below summarizes the PHA Plan submission requirements by PHA category. The 5-Year Plan, Annual Plan templates and certifications must be completed and submitted to HUD to meet plan requirements.

<i>PHA Plan Submission Requirements by PHA Category</i>	
HUD Form	Frequency of Submission
<i>All PHAs</i>	
HUD 50075-5Y	Once every 5 PHA Fiscal Years
<i>Qualified PHAs</i>	
HUD 50077-SL	Once every 5 PHA Fiscal Years
HUD 50077-CR	Annually
<i>Standard PHAs and Troubled PHAs</i>	
HUD 50075-ST	Annually
HUD 50077-ST-HCV-HP	Annually
HUD 50077-SL	Annually
<i>High Performer PHAs</i>	
HUD 50075-HP	Annually
HUD 50077-ST-HCV-HP	Annually
HUD 50077-SL	Annually
<i>Small PHAs</i>	
HUD 50075-SM	Annually
HUD 50077-CRT-SM	Annually
HUD 50077-SL	Annually
<i>HCV-Only PHAs</i>	
HUD 50075-HCV	Annually
HUD 50077-ST-HCV-HP	Annually
HUD 50077-SL	Annually

IV. CERTIFICATIONS AND OTHER SUBMISSION REQUIREMENTS

This section discusses the certification requirements identified in the table above and describes in more detail additional requirements for certain planned activities.

- a. **Civil Rights Certification.** In accordance with Section 5A of the U.S. Housing Act of 1937 (42 USC § 1437c-1) and regulations at 24 CFR 903.7(o), PHAs must certify annually that they are in compliance with the Fair Housing Act, Title VI of the Civil Rights Act, Section 504 of the Rehabilitation Act of 1973, Title II of the Americans with Disabilities Act of 1990, as well as certifying that they will affirmatively further fair housing. These requirements are contained within the various forms for each category of PHA identified below:

- **Form HUD-50077-CR** – Civil Rights Certification (*Qualified PHAs*). Qualified PHAs submit this form annually.

- **Form HUD-50077-SM** – PHA Certifications of Compliance with the PHA Plans, Civil Rights and Related Laws and Regulations (*Small PHAs*).
 - **Form HUD-50077-ST-HCV-HP** – PHA Certifications of Compliance with the PHA Plan, Civil Rights and Related Laws and Regulations (*Standard, Troubled, High Performer and HCV-Only PHAs*).
- b. **Certification by State or Local Official of PHA Plans Consistency with Consolidated Plan or State Consolidated Plan.** All non-Qualified PHAs are required to obtain and submit to HUD with their Annual Plans a certification from a State or local official of the Annual Plan’s consistency with the Consolidated Plan incorporating any applicable fair housing goals or strategies (**Form HUD-50077-SL**). Qualified agencies must submit the HUD-50077-SL with their 5-Year Plan. The PHA plan regulations require that this certification be submitted to HUD, not simply retained on file at the PHA.
- HUD will not consider the PHA Plan submission complete and ready for review until the forms in sections a and b above have been received at the appropriate local HUD Field Office or in the Public Housing Portal.
- c. **Rental Assistance Demonstration (RAD).** Conversion of assistance under RAD will be considered a significant amendment to the PHA’s 5-Year Plan for Qualified and non-Qualified PHAs, the Annual Plan for non-Qualified PHAs, and the Moving to Work (MTW) Plan for MTW PHAs. In addition to the information already required by 24 CFR part 903 for PHA Plan amendments, refer to the revised RAD Notice PIH-2019-23, REV-4 issued September 5, 2019, as amended by most recent supplement and any successor guidance (RAD Notice). See Appendix 1D of the RAD Notice for guidance on what information must be submitted as attachments to the 5-Year Plan and/or the Annual Plan (or to a Significant Amendment to the Plan) for RAD conversion actions. Note that if a PHA is proposing an action that blends RAD and Section 18 disposition (“RAD/Section 18 blend”) (see PIH Notice 2021-07, or any amendments or successor notices, and the RAD Notice), the PHA must comply with the PHA Plan requirements for both RAD and Section 18 demolition/disposition. HUD encourages PHAs to fully describe the blend, as well as the impacts on residents living in the Section 18 units, as part of Appendix 1D of the RAD Notice.
- d. **Designated Housing Plans (DHPs).** PHAs are reminded that while the designated housing application and approval process is a separate process, a statement on developments designated for occupancy by only elderly families, only families with disabilities or elderly families and families with disabilities must be in the PHA Plan (See Notice PIH 2021-01). 24 CFR 903.7(i) requires PHAs to identify any public housing developments owned, assisted, or operated by the PHA, or any portion of these developments, that the PHA has designated or will apply for designation. Qualified PHAs that wish to submit a DHP must incorporate minutes from their annual meeting to demonstrate that this information was presented during the annual planning process.

- e. **Project Based Voucher (PBV) Activities.** 24 CFR 903.7(r) now requires that if a PHA participates in the PBV program, the PHA's Annual Plan must incorporate a statement of the projected number of project-based units, the general location of the project-based units, and how project-basing would be consistent with its Annual Plan. To accommodate this new requirement, Section B.2 of form HUD-50075-HCV now adds this element. Additionally, 24 CFR 903.6(c) now requires that if a PHA intends to select one or more projects for PBVs without competition in accordance with 24 CFR 983.51(c), the PHA must incorporate a statement of this intent in its 5-Year Plan (or in an amendment to the 5-Year Plan) to notify the public prior to making a noncompetitive selection. Form HUD-50075-5Y now contains Section B.5 to capture this information, as applicable. For PHAs that have already begun preparing their upcoming submissions on the prior version of the PHA Plan forms (see Section 8 for information about use of the new form versions), please see Notice PIH 2024-19, Section 7, for information about compliance with 24 CFR 903.6(c) and 903.7(r).
- f. **Statement of Capital Improvements Needed.** To comply with the requirements of 24 CFR 903.7(g), PHAs must incorporate a statement of capital improvements needed in the Annual Plan. The PHA must reference in its Annual Plan the most recent HUD approved Capital Fund 5-Year Action Plan (HUD 50075.2). PHAs can reference the form by stating the following language in the **Capital Improvements** section of the appropriate Annual Plan Template: "See the form HUD 50075.2 approved by HUD on XX/XX/XXXX." This reference statement is also submitted in the Energy and Performance Information Center (EPIC) and is intended to mean that the 50075.2 describes the capital improvements necessary to ensure long-term physical and social viability of the projects. It is anticipated that the local Field Office will have a copy of the most recent HUD approved Capital Fund 5 Year Action Plan (50075.2) on file. Refer to the website for HUD's Office of Capital Improvements at:
http://portal.hud.gov/hudportal/HUD?src=/program_offices/public_indian_housing/programs/ph/capfund for more information on Capital Fund processing.

V. LOCAL ACCOUNTABILITY IN THE PHA PLANNING PROCESS

Per 24 CFR 903.3(b), the purpose of the 5-Year Plan and the Annual Plan is to provide an easily identifiable source by which public housing residents, participants in the tenant-based and project-based voucher program, and other members of the public may locate basic PHA policies, rules and requirements concerning the PHA's operations, programs and services. Additionally, the plan provides a strategic planning framework for PHA management operations, capital planning and local accountability. PHAs are reminded of the following requirements of the public participation in the PHA planning process.

- a. **Resident Advisory Board (RAB) Comments.** Section 511 of the United States Housing Act and the regulations at 24 CFR part 903 require that PHAs establish one or more Resident Advisory Board(s) (RAB) as part of the PHA Plan process. PHAs must submit any comments received from the RAB as an attachment to the 5-Year Plan and Annual Plan. PHAs must also add a narrative describing their analysis of

the recommendations and the decisions made on these recommendations (see 24 CFR 903.13). Additionally, PHAs must provide reasonable means for RABs to become informed on programs covered by the PHA Plan, to communicate in writing and by telephone with assisted families, to hold meetings with those families, and to provide access to information regarding covered programs on the internet, considering the size and resources of the PHA. For Resident organizations, additional resources can be found in the [Resident Advisory Board \(RAB\) Guide](#)² on the HUD Exchange. Those seeking technical assistance should email REACHMod@hud.gov.

- b. **Annual Public Hearings.** All PHAs (Qualified and non-Qualified) must annually hold a public hearing regarding any changes to the plan, goals, objectives, and policies and invite public comment regarding such changes. 24 CFR 903.3(b)(1) confirms that local accountability is one of the purposes of the PHA Plans. For this reason, HUD considers the annual public hearing essential to PHAs in determining whether changes to goals, objectives, and policies are needed.
- c. **Challenged Elements.** Per 24 CFR 903.23(b), if any element of the 5-Year Plan or Annual Plan is challenged, a PHA must provide such information as an attachment to the 5-Year Plan or Annual Plan with a description of any challenges to plan elements, the source of the challenge, and the PHA's response. HUD has maintained this element in revised versions of the PHA Plan templates.
- d. **Public Availability.** Pursuant to 42 USC § 1437c-1(i)(5) and 24 CFR 903.23(e), a PHA must make the approved plans and required attachments and documents related to the plans available to the public for review and inspection at the principal office of the PHA during normal business hours. Additionally, the PHA must provide information on how the public may reasonably obtain additional information of the PHA policies contained in the standard Annual Plan but excluded from their streamlined submissions to HUD (24 CFR 903.11(b)). HUD strongly encourages PHAs to provide copies of the approved plans to each resident council and Resident Advisory Board, as well as make a copy available at each asset management project office. PHAs should also proactively produce accessible and translated versions of the approved plans consistent with their obligations under (1) Section 504 of the Rehabilitation Act of 1974 and HUD's implementing regulations at 24 CFR part 8 and (2) language access requirements of Title VI of the Civil Rights Act of 1964. Additionally, PHAs are strongly encouraged to also post the template submission and all plan elements in an accessible format on their website if available.
- e. **Amending or Modifying a Plan.** As is described in 24 CFR 903.21, the PHA may amend or modify its 5-Year Plan or Annual Plan after submitting the plan to HUD. If the modification or change is considered a "substantial deviation/modification" (from the 5-Year Plan) or "significant amendment" (from the Annual Plan) as defined by the PHA (24 CFR 903.7(s)(2)), then the PHA must comply with all of

² <https://www.hudexchange.info/programs/public-housing/resident-toolkit/public-housing-resident-organizing-and-participation-guides/resident-advisory-boards-and-the-housing-authority-plan-process/>

requirements followed at the initial development and submission of the PHA Plan (ex: time frames for public review). This would also be required 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. Such changes can be made at any time and require the PHAs to repeat the planning process (public posting, public hearing, and submission for HUD review) if they need to implement the policies prior to their usual Annual Plan timeline. For plan revisions that are considered a “substantial deviation/modification” or a “significant amendment”, PHAs will need to comply with the following requirements:

- 1) The PHA must consult with the Resident Advisory Board (RAB) (as defined in 24 CFR 903.13).
- 2) The PHA must ensure consistency with the Consolidated Plan of the jurisdiction(s) (as defined in 24 CFR 903.15).
- 3) The PHA must provide for a review of the amendments/modifications by the public during a 45-day public review period (as defined in 24 CFR 903.17).
- 4) The PHA may not adopt the amendment or modification until the PHA has duly called a meeting of its Board of Directors (or similar governing body). This meeting, at which the amendment or modification is adopted, must be open to the public.
- 5) The PHA may not implement the amendment or modification until notification of the amendment or modification is provided to HUD and approved by HUD in accordance with HUD’s plan review procedures (as defined at 24 CFR 903.23).

For changes that do not meet the PHA’s definition of a “substantial deviation/modification” or a “significant amendment”, the PHA may modify, amend or change any policy, rule, regulation or other aspect of its plan in accordance with PHA policy and board approval. However, PHAs should be mindful that there may be additional notifications requirements for certain policy changes which require PHA implementation. As an example, for any changes to the public housing lease, the PHA must give at least 30-day written notice to each affected tenant, setting forth the proposed modification, the reasons for the change, and provide tenants an opportunity to present written comments which shall be taken into consideration by the PHA prior to the proposed modification becoming effective (24 CFR 966.5).

VI. INSTRUCTIONS FOR ACCESSING AND SUBMITTING THE REVISED PHA PLAN TEMPLATES AND OTHER REQUIRED FORMS

Accessing. As of April 2024, the PHA Plan templates, certification forms, and technical instructions for their use are available in the Public Housing Portal (accessible via [HUD Secure Systems](#)). HCV-only PHAs also have access to this system. Be sure to sign up for the [PH-FMD listserv](#) to receive any future updates and live trainings on the automated PHA Plan.

For questions on obtaining access to the Public Housing Portal, please refer to the [Public Housing Agency User Guide to Assigning WASS Roles for the Public Housing Portal](#) or contact your local Field Office. Send all technical questions on the use of the Public Housing Portal to PublicHousingPortal@hud.gov.

Submitting. The Public Housing Portal provides PHAs with a streamlined submission process for the PHA Plan, required certifications, and associated documents (i.e. RAB and public comments) and facilitates simplified review and collaboration with HUD to make corrections to the PHA Plan. HUD will review the plans according to the statutory review requirements.

Additionally, HUD strongly encourages PHAs to continue to attach their complete written Admissions and Continued Occupancy Policies (ACOP) and/or Administrative Plans (AP) to their automated PHA Plan submissions. Note that HUD's approval of the PHA Plan does not indicate that these documents are reviewed and approved as part of the PHA Plan approval process.

Currently, PHAs that do not wish to use the automated PHA Plan Templates may make other arrangements to submit their PHA Plan to HUD. Please contact your local Field Office for further instructions. However, submitting the automated PHA Plan Templates will be required commencing with PHAs with fiscal years beginning 1/1/2026.

Consequences for Failure to Submit Approvable PHA Plans. If a PHA fails to submit complete PHA Plans in a timely manner, HUD may impose a range of sanctions such as the possible withholding of, or future reductions in funding to the Capital Fund program, the Operating Fund, or Section 8 administrative fees.

Qualified Agencies List. Each quarter, HUD will make available a list of PHAs that meet the criteria of a Qualified agency under HERA for the purpose of being exempt from the requirement to submit an Annual Plan. Contact your local Field Office PHA Plan point of contact for a copy of the qualified agencies list. Due to the processing timeline for PHAs that are required to complete and submit an Annual Plan (advance notice of a public hearing, preparation of the plan, holding the annual hearing, revisions to the plan based on public comments, submission to HUD, and HUD review), the list of Qualified PHAs that HUD posts *three quarters in advance* of a PHA's fiscal year beginning (FYB) will determine whether a PHA is exempt in the upcoming fiscal year from the requirement to submit an Annual Plan. If the PHA is on the list, they are not required to submit an Annual Plan in the upcoming fiscal year. If a PHA is not on the list, they will be required to submit an Annual Plan. If a PHA's status changes after the Qualified Agencies List is posted, the posted rating will be used to determine the PHA Plan submission requirement. PHAs are encouraged to check the Qualified Agencies List from the correct extract date.

See the table below for further clarity:

Fiscal Year Beginning (FYB)	Example	Applicable Qualified Agencies List Posting Date	Example
January 1 st	01-01-2026	April 1 st	04-01-2025
April 1 st	04-01-2026	July 1 st	07-01-2025
July 1 st	07-01-2026	October 1 st	10-01-2025
October 1 st	10-01-2026	January 1 st	01-01-2026

Submission Deadlines. PHAs should begin the annual planning process early enough to allow for the required processing timelines and to obtain appropriate plan approval from HUD before the FYB. Per 24 CFR 903.17(b), PHAs must make the proposed Annual Plan, and the required attachments related to the plan available for inspection by the public at least 45 days before the public hearing is to take place. The PHA must also allow time to revise the plan based on public comments before submitting it to HUD. PHAs should be mindful to give themselves enough time to revise the plan based on their individual capacity. Lastly, PHAs must ensure submission of their 5-Year Plan and Annual Plan in the Public Housing Portal no later than 75 days before the PHAs' FYB date (24 CFR 903.5). Note that the portal permits submissions as early as 150 days prior to the FYB.

The table below suggests the shortest possible timeline for plan submission which may not be realistic for all PHAs due to PHA size or plan complexity. The table can be used for planning purposes but should not be seen as the suggested or recommended timeline for the PHA Plan process. As a best practice, PHAs are encouraged to begin the process required for the development and public inspection of the PHA Plan 6 to 9 months in advance of the plan submission deadline.

See the table below for the minimum suggested timelines:

Fiscal Year Beginning (FYB)	Deadline for Public Posting	Deadline to Conduct Public Hearing	Deadline to Submit Plan and Certifications*
January 1 st	August 29 th (prev. yr.)	October 3 rd (prev. yr.)	October 18 th (prev. yr.)
April 1 st	November 18 th (prev. yr.)	January 2 nd	January 16 th
July 1 st	February 18 th	April 3 rd	April 17 th
October 1 st	May 19 th	July 3 rd	July 18 th
			*Assumes 2 weeks for revisions

As an additional example, please see below for a PHA with a January 1, 2026, FYB.

Fiscal Year Beginning (FYB)	Deadline for Public Posting	Deadline to Conduct the Public Hearing	Deadline to Submit the Plan and Certifications
January 1, 2026	August 29, 2025	October 3, 2025	October 18, 2025

HUD advises that deadlines represent the latest permissible dates for action, so PHAs are encouraged to schedule planning milestones for completion well in advance. This is especially important when deadlines fall on weekends or holidays. As a best practice, public hearings should be conducted in-person at a location and time that is convenient for the residents served by the PHA.

VII. IMPLEMENTATION DATE OF THE REVISED – 5-YEAR PLAN AND ANNUAL PLAN

Submission of the 5-Year Plan and Annual Plans using the revised PHA Plan Templates and other forms will be required commencing with PHAs having a fiscal year beginning 1/1/2026. However, PHAs with fiscal year beginning prior to 1/1/2026 may choose to begin to use the revised forms which will be made available on [HUD Forms Library](#) for manual submission.

VIII. CONTACT INFORMATION

If you have questions regarding this notice, please contact your local Field Office PHA Plan point of contact.

IX. PAPERWORK REDUCTION ACT

The information collections referenced in this notice have been approved by OMB pursuant to the Paperwork Reduction Act under OMB Control Number 2577-0226.



Benjamin Hobbs
Principal Deputy Assistant Secretary
Office of Public and Indian Housing