



U. S. Department of Housing and Urban Development
WASHINGTON, DC 20410-5000

Office of Public and Indian Housing

Special Attention of:

Public Housing Agencies;
Public Housing Hub Office Directors;
Public Housing Program Center Directors;
Regional Directors;
Field Office Directors;
Resident Management Corporations

NOTICE: PIH-2022-03 (HA)

Issued: February 18, 2022

Expires: Effective until amended,
superseded, or rescinded

Cross References:
24 CFR § 8.3, 8.27, 8.32,

Subject: Guidance on Unit Designation Categories and Accessible Designation Categories in IMS/PIC

- 1. Purpose.** This notice announces changes to Unit Designation Categories and Accessible Designation Categories in the Information Management System/Public and Indian Housing Information Center (IMS/PIC).
- 2. Applicability.** This notice applies to Public Housing Agencies (PHAs) administering the Public Housing program, including PHAs that participate in the Moving to Work (MTW) Demonstration.
- 3. Background.** As part of the September 2010 release of IMS/PIC, several of the Unit Designation Categories were changed to capture more detailed information on the intended occupancy of units in the public housing portfolio. The changes to IMS/PIC, described below, require PHAs to take steps to ensure that their units are properly categorized.

These IMS/PIC changes have a significant funding impact on units that PHAs may have set aside as “Designated Housing.” PHAs that wish to designate existing or new public housing units for occupancy by elderly families exclusively or for disabled families exclusively (where the head of household or spouse is an individual with disabilities) or for either elderly and disabled families exclusively, they must obtain HUD Headquarters approval of a Designated Housing Plan (DHP) and must select the appropriate Unit Designation Category for each unit in IMS/PIC as explained in Section 4.

HUD notes that this change is merely in how HUD’s IMS/PIC system operates but does not create a new legal obligation; PHAs have been and continue to be required to provide accessible units pursuant to their obligations under Section 504 of the Rehabilitation Act of 1973 (Section 504) and HUD’s Section 504 regulation. In addition, PHAs continue to be subject to the same requirements regarding designated housing plans.

HUD also notes that there is a distinction between units that are permitted to be set aside as “Designated Housing” units and accessible dwelling units that meet the applicable federal accessibility requirements under Section 504, the Fair Housing Act, and the Americans with Disabilities Act, as applicable.

The IMS/PIC changes also created a new “Accessible Designation” category for units that are accessible to persons with a mobility or sensory impairment or to contain some accessible features available to individuals with disabilities. For accessible units in existing or new public housing developments, PHAs must select the appropriate Accessible Designation Category for each unit in IMS/PIC as explained in Section 5. In conjunction with updating IMS/PIC with an Accessibility Designation, the PHA certifies the accuracy of the designation.

4. Unit Designation Categories.

4.1. Changes to the Unit Designation Categories in IMS/PIC. The September 2010 IMS/PIC system release implemented three significant changes to the Unit Designation Categories:

1. All units that were in the Unit Designation Categories formerly entitled *Family Unit*, *Elderly Unit*, *Family and Disabled*, and *Elderly and Disabled* were automatically placed into a new Unit Designation Category entitled *General Occupancy*. The Categories *Family Unit*, *Elderly Unit*, *Family and Disabled*, and *Elderly and Disabled* no longer exist in IMS/PIC.
2. *Mixed Elderly and Disabled Not HUD Officially Designated* was created as a new Unit Designation Category. No units were automatically placed into this category.
3. *Merged Units* are now reported in the Unit Designation detail. *Merged Units* were previously reported in the Unit Tenant Status detail.¹

¹ Please reference PIH Notice 2021-35 and all subsequent extension or reinstatement notices for further information about non-dwelling units and other Unit Tenant Statuses.

The chart below illustrates these changes:

Unit Designation Categories effective September 24, 2010		Prior Unit Designation Categories	
FA	General Occupancy	FA	Family Unit
		EL	Elderly Unit
		FD	Family and Disabled
		ED	Elderly and Disabled
NA	Non-Dwelling	NA	Not Applicable (included Merged and Non-Dwelling)
ODD	Officially Disabled	ODD	Officially Designated Disabled
ODE	Officially Elderly	ODE	Officially Designated Elderly
ODM	Officially Mixed Elderly and Disabled	ODM	Officially Designated Mixed
MED	Mixed Elderly and Disabled Not HUD Officially Designated		
MU	Merged Unit		

PHAs must ensure that units are properly categorized according to the definitions below. **Note:** Certain Unit Designation Categories require a HUD-approved Designated Housing Plan (DHP). DHP approval for a new request is granted initially for 5-years followed by renewals granted in two-year increments.

Definitions

General Occupancy: This is the default category. These are units that are not officially designated, and do not meet the criteria for *Mixed Elderly and Disabled Not HUD Officially Designated, Merged, or Non-Dwelling* units. Any family type may occupy a general occupancy unit.

Non-Dwelling: These are units that are recorded in a Non-Dwelling Unit Tenant Status in IMS/PIC. The Non-Dwelling Unit Tenant Statuses are defined in Notice 2021-35.

When a unit enters a Non-Dwelling Unit Tenant Status in IMS/PIC, the Unit Designation Category is automatically changed to *Non-Dwelling* in the IMS/PIC system.

Officially Disabled: These are units covered under an active, HUD-approved DHP for occupancy by disabled families exclusively. If the DHP is not renewed, the units must be returned to the appropriate category in IMS/PIC.

Officially Elderly: These are units covered under an active, HUD-approved DHP for occupancy by elderly families exclusively. If the DHP is not renewed, the units must be returned to the appropriate category in IMS/PIC.

Officially Mixed Elderly and Disabled: These are units covered under an active, HUD-approved DHP for occupancy by elderly families and disabled families exclusively. If the DHP is not renewed, the units must be returned to the appropriate category in IMS/PIC.

Mixed Elderly and Disabled Not HUD Officially Designated: These are units that were reserved for elderly families and disabled families at inception and have retained that character since at least April 13, 1994².

Merged Unit: A *Merged Unit* results when the number of public housing units in a building is changed by structurally combining two or more smaller units into a single larger unit. The unit or units that cease to exist as separate units are recorded as *Merged Units*.

4.2. Making Unit Designation Category Changes in IMS/PIC. Based on the information provided above, PHAs must review their portfolios in IMS/PIC to ensure that units are in the correct Unit Designation Categories. If a PHA discovers an error, the PHA must correct the error in IMS/PIC within 30 days of the publication of this notice no later than March 31, 2022. The PHA must follow the instructions below to correct the error in IMS/PIC:

1. If a unit is categorized in *Officially Disabled, Officially Elderly, Officially Mixed Elderly and Disabled, or Mixed Elderly and Disabled Not HUD Officially Designated*, and the unit belongs in *General Occupancy*, then the PHA must make the correction in IMS/PIC. HUD user approval is not required.
2. If a unit is categorized in *General Occupancy*, and the unit has been approved as *Officially Disabled or Officially Elderly, Officially Mixed Elderly and Disabled, or is Mixed Elderly and Disabled Not HUD Officially Designated*, then the PHA must propose a change in IMS/PIC. HUD user approval is required.
3. Only HUD users may change a Unit Designation to *Merged Unit* as requested by the PHA outside of IMS/PIC.
4. HUD user approval is required in IMS/PIC to place a unit in a Non-Dwelling Unit Tenant Status. When a unit enters a Non-Dwelling Unit Tenant Status in IMS/PIC, the Unit Designation Category is automatically changed to *Non-Dwelling*.

To assist PHAs in this effort, HUD will publish data highlighting discrepancies between counts of Designated Units by PHA in IMS/PIC and information on approved Designated Housing Plans. This information will be made available at the Designated Housing web page at the following address and will be updated periodically:

https://portal.hud.gov/hudportal/HUD?src=/program_offices/public_indian_housing/programs/p/h/dhp

4.3. Maintaining Accuracy of Unit Designation Categories in IMS/PIC. PHAs must maintain the accuracy of Unit Designation Categories in IMS/PIC on an ongoing basis. To this

² April 13, 1994, is the date on which the changes brought about by the Housing and Community Development Act of 1992, which amended Section 7 of the US Housing Act of 1937, could first be implemented

end, when a Unit Designation changes, PHAs must update IMS/PIC to reflect the change within 30 days of the publication of this notice and resolve any related issues no later than March 31, 2022. Common circumstances that may prompt changes in Unit Designation Categories include HUD Headquarters approvals of DHPs, amendments to DHPs, expirations of DHPs, the merging of units, and changes in the use of units between Non-Dwelling and Dwelling purposes.

PHAs are required to certify to the accuracy of their Building and Unit data, including Unit Designations, during the annual Capital Fund IMS/PIC certification period. It is imperative that PHAs certify accurately, as Unit Designation statuses may impact the amount of funding received under the Capital Fund Formula described at 24 CFR 905.400. Should a PHA encounter inaccuracies in the Unit Designation information that cannot be remedied in advance of the certification deadline, the PHA must reject the certification; however, the PHA should make every effort to have their unit designations corrected prior to the certification period expiration. See Notice PIH 2011-58 (HA) and all subsequent extension or reinstatement notices. To prevent improper payments, HUD may suspend new Capital Fund grants awarded to PHAs with documented discrepancies in their Unit Designation data (e.g., discrepancies between designated units in approved DHPs and recorded in IMS/PIC) until the discrepancies can be resolved.

5. Accessible Designation Categories.

5.1. Changes to Accessible Designation Categories in IMS/PIC. The September 2010 IMS/PIC system release implemented the accessible designation categories available to more accurately reflect the physical characteristics of public housing units to accommodate individuals with disabilities. PHAs must ensure that units are properly categorized according to the definitions below. Please note that all four accessible labels will be changed in IMS/PIC concurrently with the publication of this notice.

Accessibility Standard for Section 504 Compliance

Under HUD's Section 504 regulation, the Uniform Federal Accessibility Standards (UFAS) is the identified standard for Section 504 compliance. UFAS guidelines and standards can be found at <https://www.access-board.gov/aba/ufas.html>, 24 CFR 8.32 and all subsequent extensions or revisions.

On May 23, 2014, the Department issued a notice (HUD's Deeming Notice 79 Fed. Reg. 29671) allowing PHAs and other grantees to use an alternative accessibility standard instead of UFAS until HUD formally revises its Section 504 regulation to adopt an updated accessibility standard. With the issuance of HUD's Deeming Notice, a unit may comply with Section 504 requirements for units for persons with mobility impairments and units for persons with vision/hearing impairments using the 2010 Standards Under Title II of the ADA with identified exceptions until HUD adopts a new accessibility standard. Units that comply with the alternative accessibility standard contained in the Department's notice at 79 Fed. Reg. 29671 (May 23, 2014) are also to be counted as Mobility Impairment - Section 504. **Note:** Units that comply with the design and construction requirements of the Fair Housing Act (See 24 CFR 100.205) do not categorically qualify as UFAS-compliant units, nor do units that are partially accessible.

PHAs are reminded that under HUD's Section 504 regulations for new construction and substantial alterations of multifamily housing projects, 5% of units must be accessible for

persons with mobility impairments and an additional 2% of units must be accessible for persons with hearing/vision impairments. PHAs must also continue to occupy these units in compliance with Section 504 and other applicable civil rights statutes and regulations. In addition, the PHA may have to make additional accessibility modifications or add accessible units in accordance with reasonable accommodations for otherwise eligible prospective or current residents. (See 24 CFR 8.33.)

In addition, to Section 504 compliance, as a reminder, HUD notes that most PHAs must comply with Title II of the Americans with Disabilities Act, because Title II of the ADA covers housing provided by public entities. Generally, the 2010 ADA Standards are the standards for compliance with the ADA physical accessibility requirements.³ In addition, buildings with four or more units, built for first occupancy after March 13, 1991, must comply with the accessibility requirements of the Fair Housing Act. The standards for compliance are set forth in 24 C.F.R. §100.205, including the safe harbors listed in § 100.205(e)(1)-(2).

Definitions

These definitions are the categories that will appear in IMS/PIC system for purposes of documenting designated accessible units for Section 504 purposes.

Mobility Impairment - Section 504 (Formerly UFAS Barrier-Free Accessible)

Mobility Impairment-Section 504 units were formerly categorized as UFAS Barrier-Free Accessible units. These are units that comply with the accessibility requirements specified in 24 CFR part 8 and HUD's accessibility standard – either UFAS or the alternative accessibility standard explained above that are applicable to units for persons with mobility impairments.

Hearing/Visual Impairment - Section 504 (Formerly Hearing/Visual Impairment)

These are units that comply with the accessibility requirements specified in 24 CFR part 8 and HUD's accessibility standard – either UFAS or the alternative accessibility standard that are applicable to persons with hearing or vision impairments. Units that meet both *Mobility Impairment - Section 504* and *Hearing/Visual Impairment - Section 504* standards should be reported as *Hearing/Visual Impairment - Section 504*.

Partially Accessible (Formerly Standard)

The term *Partially Accessible* refers to a unit that is located on an accessible route and has some accessibility features but does not meet either the *Mobility Impairment - Section 504* or *Hearing/Visual Impairment - Section 504* standards. A unit is not “accessible” in accordance with HUD's Section 504 regulation unless it complies with UFAS, or the alternative standard set out in HUD's Deeming Notice published in the Federal Register and HUD's Section 504 regulation at 24 CFR part 8.

Not Accessible (Formerly Not Applicable)

The term *Not Accessible* refers to all units that are not designated otherwise in this category. This is the default category for all units. No action by the PHA is necessary if the unit does not meet the category definitions for accessible units as described above.

³ See 28 CFR 35.151(c) “Accessibility standards and compliance date” for compliance dates for which standards apply.

5.2. Making Accessible Designation Category Changes in IMS/PIC. Based on the definitions above, PHAs must review their portfolio in IMS/PIC to ensure that units are in the correct Accessible Designation Categories. If a PHA discovers an error, the PHA must correct the error in IMS/PIC within 30 days of the publication of this notice and clean-up any issues that exist for current approvals no later than March 31, 2022.

Note: Accessible Designations require the PHA to propose a change in IMS/PIC and obtain HUD user approval. Once HUD approval is made in the IMS/PIC system, the Accessible Designation is then changed in IMS/PIC. HUD user approval of an accessible designation is not a determination that a unit meets accessibility requirements or that the PHA complies with Section 504 of the Rehabilitation Act of 1973, HUD's implementing regulations at 24 CFR part 8, the Americans with Disabilities Act, ADA implementing regulations at 28 CFR part 35, or the accessibility requirements of the Fair Housing Act.

5.3. Maintaining Accuracy of Accessible Designation Categories in IMS/PIC. PHAs must maintain the accuracy of Accessible Designation Categories in IMS/PIC on an ongoing basis. For example, when an Accessible Designation changes, PHAs must update IMS/PIC to reflect the change within 30 days of the publication of this notice and resolve any issues that exist for current approvals no later than March 31, 2022. Common causes that may prompt changes in Accessible Designation Categories include renovations to units that change the accessibility features available. Note that the Accessible Designation refers to features of the unit, not of the tenant occupying the units; whether the household occupying the unit requires the accessibility features of the unit does not have a bearing on the Accessible Designation recorded in IMS/PIC.

6. Instructions for Obtaining HUD-user Approval in IMS/PIC. The IMS/PIC system requires various levels of HUD approval to maintain data accuracy and integrity. Therefore, HUD user approval may be necessary to make certain changes to a unit designation category. This is demonstrated in the chart below.

The chart below illustrates IMS/PIC HUD User Action Requirements:

New Unit Designation Categories	HUD User Action Required?
General Occupancy	No
Non-Dwelling	This status is automatically entered when the Unit Tenant Status is changed to a Non-Dwelling use. The Unit Tenant Status change requires HUD user approval ⁴ .
Officially Disabled, Officially Elderly, or Officially Mixed Elderly and Disabled (These are units covered under an active, HUD-approved DHP.)	Yes; Requires HUD user approval of the Unit Designation change.
Mixed Elderly and Disabled Not HUD Officially Designated	Yes; Requires HUD user approval of the Unit Designation change.
Merged Unit	Yes; Only a HUD user may make this change.

To obtain HUD-user approval in IMS/PIC, see the instructions below. More detailed instructions can be found on the IMS/PIC Job Aids page at https://www.hud.gov/program_offices/public_indian_housing/systems/pic/ts.

6.1 Unit Designation Assignment Instructions for PHA Users.

1. Select the Development sub-module from the left side of the IMS/PIC main page.
2. Use the drop-boxes on the Development Profile page to select the Physical Development containing the unit for which you would like to make a Unit Designation Category change.
3. Select the Unit tab.
4. Select the Unit Number (blue, left side of screen) for the unit for which you would like to make a Unit Designation Category change.
5. Next to "Unit Designation" click the blue "Modify" link.
6. The next screen will have two drop-down boxes with unit designations. The drop-down box on the left side of the screen is for new unit designations that do not require HUD approval (*General Occupancy* only.) The drop-down box on the right side of the screen is for new unit designations that do require HUD approval (*Officially Disabled, Elderly, Mixed Elderly and Disabled; and Mixed Elderly and Disabled Not HUD Officially Designated.*) Select the appropriate unit designation from the drop-down box.
7. Select the appropriate "Reason for Change in Unit Designation" from the drop-down box.
8. Enter comments, if desired.
9. Click "Save" (for a change to *General Occupancy*), or "Propose Change" (for a change to *Officially Disabled, Elderly, Mixed Elderly and Disabled, or Mixed Elderly and Disabled Not HUD Officially Designated*). Where a PHA has selected "Propose

⁴ Notice 2011-7 and all subsequent extension or reinstatement notices.

- Change” for *Officially Disabled, Elderly, or Mixed Elderly and Disabled*, the Public and Indian Housing (PIH) Field Office will review the request considering a PHA’s DHP. Where a PHA has selected “Propose Change” for *Mixed Elderly and Disabled Not HUD Officially Designated*, additional documentation may be required by the Field Office.
10. After all changes have been proposed, they need to be submitted for HUD approval. To do so, click on the Submission tab and Submit Unit Status Changes link in the colored bar under the Submission tab. Then, click "Submit Data for Approval." Notify the local field office so they can approve this change.
 11. Note that many changes to IMS/PIC data must be followed by a building and unit submission and approval process before being incorporated into the Capital Fund IMS/PIC certification. For that reason, once the Unit Status Changes are approved, PHAs should also submit the building and unit data for HUD approval. To do so, navigate to the Submission tab. Then select “Submit Data for Approval”. When the screen refreshes, users should see a new row in the table at the bottom that says “Submitted” (NOT “Submitted (for Unit Status Changes”)”).

6.2 Accessible Designation Assignment Instructions for PHA Users.

1. Select the Development sub-module from the left side of the IMS/PIC main page.
2. Use the drop-down box on the Development Profile page to select the Physical Development containing the unit for which you would like to make an Accessible Designation Category change.
3. Select the Unit tab.
4. Select the Unit Number (blue, left side of screen) for the unit for which you would like to make an Accessible Designation Category change.
5. Next to "Accessible Designation" click the blue "Modify" link.
6. Select the appropriate "New Accessible Designation" from the drop-down box.
7. Select the appropriate "Reason for Change in Accessible Designation" from the drop-down box.
8. Enter comments, if desired.
9. Click "Propose Change".
10. You will then need to submit the change request to HUD. To do so, click on the Submission tab and Submit Unit Status Changes link in the colored bar under the Submission tab. Then, click "Submit Data for Approval." Notify the local field office so they can approve this change.

7. Paperwork Reduction Act. The information collection requirements contained in this Notice have been approved by the Office of Management and Budget (OMB) under the Paperwork Reduction Act of 1995 (44 U.S.C. 3501-3520) and assigned OMB control number 2577-0157. In accordance with the Paperwork Reduction Act, HUD may not conduct or sponsor, and a person is not required to respond to, a collection of information unless the collection displays a currently valid OMB control number.

8. Further Information. For further information about this Notice, contact the nearest HUD Office of Public Housing within your region. Locations of these offices are available on HUD's website at <http://www.hud.gov>.

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for Public and Indian Housing