

CHAPTER 4. DATA COLLECTION

4.1 OBJECTIVE. The objective of this Chapter is to provide information on the collection of data necessary to conduct a management assessment.

4.2 PHA RESPONSIBILITY.

A. To obtain information on the indicators considered in an assessment when the information is not already available to HUD, PHAs are required to submit responses and a certification in the form of responses to a questionnaire, Form HUD-50072, Public Housing Management Assessment Program (PHMAP) Certification, Appendix 4, within 90 calendar days after their fiscal year begins (FYB) for six of the indicators. Information on many of the indicators to be used in an assessment will be derived by the Field Office from existing reporting and data forms. 24 CFR 901.100(a) and (b)

1. The six indicators a PHA shall certify to are as follows:

- a. Indicator #1, vacancy number and percentage;
- b. Indicator #3, rents uncollected;
- c. Indicator #5, unit turnaround;
- d. Indicator #6, outstanding work orders;
- e. Indicator #7, annual inspection and condition of units and systems;
 - (1) Component #1, system to track inspection and repair of units and systems;
 - (2) Component #2, annual inspection of units;
 - (3) Component #3, correction of unit deficiencies;
 - (4) Component #4, inspection and repair of systems; and
- f. Indicator #11, resident initiatives.

Chapter 4, paragraph 4-2A (continued)

2. The six indicators that the Field Office will complete from existing data and report forms are as follows:

- a. Indicator #2, modernization;
 - (1) Component #1, unexpended funds over three years old;

- (2) Component #2, timeliness of fund obligation;
- (3) Component #3, contract administration;
- (4) Component #4, quality of the physical work;
- (5) Component #5, budget controls;
- b. Indicator #4, energy consumption;
- c. Indicator #8, tenants accounts receivable;
- d. Indicator #9, operating reserves;
- e. Indicator #10, routine operating expenses;
- f. Indicator #12, development/major reconstruction of obsolete projects (MROP);
 - (1) Component #1, quality of contract administration;
 - (2) Component #2, timeliness of development/MROP;
 - (3) Component #3, quality of the physical work; and
 - (4) Component #4, budget controls.
- 3. The certification, Form HUD-50072, Public Housing Management Assessment Program (PHMAP) Certification, is included as Appendix 4 to this Handbook.
- 4. Optional worksheets for the calculation of all of the indicators a PHA certifies to, as well as sample completed worksheets are included in Appendix 5. The optional worksheets are not HUD forms and are not required.

Chapter 4, paragraph 4-2A4 (continued)

Also included in Appendix 5 are optional and sample completed worksheets for indicators #4, #9 and #10 to enable a PHA to determine its achievement under these indicators. A PHA is not required to submit these worksheets to HUD when it submits its certification, Form HUD-50072, Public Housing Management Assessment Program (PHMAP) Certification. The worksheets are offered as a suggested format for use by PHAs. A PHA may choose to develop its own format and procedures for the calculation of these indicators. If a PHA chooses not to utilize the optional worksheets, its results shall be the same as would be derived by utilizing the optional worksheets.

5. To further facilitate ease of reporting, items that are currently being certified to will be incorporated into existing HUD forms, where possible.
 6. A well-managed PHA should normally be tabulating and submitting the information required on the certification form on a regular basis to its Board of Commissioners.
- B. A PHA's certification within 90 calendar days after its FYB of the responses allows PHAs time to calculate year end data and submit their certification to the Field Office.
1. A PHA's certification for all of the indicators shall be for information pertaining to a PHA's immediate past fiscal year, unless otherwise stated for the purposes of the public housing Comprehensive Grant Program (CGP) under 14 of the Act.
 2. A PHA certification of the responses shall be the actual data for each respective indicator. A PHA's certification of responses shall not include data which takes into account any exclusions or modifications that a PHA is requesting. The Field Office will adjust a PHA's grade and score when exclusion and modification requests are approved.
 3. A PHA's certification of the responses must be approved by Board resolution, signed by the Chairman of the Board and attested to by the Executive Director. The reason for Board action is the extreme importance of accuracy in a PHA's certification of the responses. 24 CFR 901.100(b)(1)

Chapter 4, paragraph 4-2B (continued)

4. To ensure the integrity of the system, appropriate sanctions for intentional false certification shall be imposed, including suspension or debarment of the signatories, the loss of high performer designation and a lower total weighted PHMAP score. Information sufficient to support the reasonable belief that an intentional false certification has occurred may be obtained from a thorough review, investigation, audit, or any other source that produces adequate evidence of intentional false certification. 24 CFR 901.100(d)
- C. The initial year of PHMAP implementation for the purposes of the CGP will be in two phases. This phase approach is necessary in order to use the PHMAP assessment to identify PHA management deficiencies, as required by the CGP. PHAs will submit their certifications within 90 calendar days after their FYB for subsequent years. The phase approach enables the Department to identify individual PHA deficiencies and allow PHAs adequate time to address identified deficiencies in their Comprehensive Plans

which are required by the CGP. This approach will also ensure that CGP funding is allocated in a timely manner by the Department. 24 CFR 901.100(b)

1. First phase submission.

- a. During the first phase of the PHMAP assessment and for the purposes of the CGP, Field Offices will assess PHAs with 500 or more public housing units under management, excluding determination of mod-troubled designation. All CGP PHAs with 500 or more public housing units under management shall submit their certifications, based upon their 1991 fiscal year, within 45 calendar days after the publication of the interim rule in the Federal Register. This PHMAP assessment will be for the FFY 1992 CGP. This time line is necessary to allow these PHAs sufficient time to address management deficiencies in their Comprehensive Plans for the FFY 1992 CGP. Field Offices will then have an additional 45 calendar days to perform the PHMAP assessment. 24 CFR 901.100(a) and (b)
- b. The certification submission for the FYB 01-01-92 PHAs with 500 or more public housing units under management will also be used for the FFY 1993 CGP, with the inclusion of mod-troubled determination. FFY 1993 assessments of the modernization

3/92

4-4

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Chapter 4, paragraph 4-2C1b (continued)

indicator will be updated, as appropriate. 24 CFR 901.100(a) and (b)

- c. The data in the following schedule shows PHA dwelling unit size, PHA fiscal year begin (FYB), PHA submission date, PHA data source based on fiscal year end dates, FFY CGP purposes and the completion date for Field Office assessment. 24 CFR 901.100(a) and (b)

First Phase of PHMAP

PHA Size	PHA FYB	PHA Submission	Data Source	FFY CGP Purposes	Field Off. Assessment
500+	01-01-92	03-02-92	12-31-91	1992&93	04-16-92
500+	04-01-92	03-02-92	03-31-91	1992	04-16-92
500+	07-01-92	03-02-92	06-30-91	1992	04-16-92
500+	10-01-92	03-02-92	09-30-91	1992	04-16-92

2. Second phase submission.

- a. During the second phase of PHMAP implementation and for the purposes of the CGP, PHAs with 250-499 public housing units under management with FYB 04-01-92 shall submit their certifications for their immediate past fiscal year on June 1, 1992. This time line is necessary to allow these PHAs sufficient time to address management deficiencies in their Comprehensive Plans for the FFY 1993 CGP. These PHMAP assessments will be for the FFY 1993 CGP, with the inclusion of mod-troubled determination. Field Offices will then have 45 calendar days to perform the PHMAP assessment. 24 CFR 901.100(a) and (b)
- b. For the purposes of the CGP, PHAs with 250-499 public housing units under management with FYB 07-01-92 and 10-01-92 shall submit their certifications based upon their 1991 fiscal year, by June 1, 1992. This time line is necessary to allow these PHAs sufficient time to address management deficiencies in their Comprehensive Plans for the FFY 1993 CGP. These PHMAP assessments will be for the FFY 1993 CGP, with the inclusion of mod-troubled determination. 24 CFR 901.100(a) and (b)

4-5

3/92

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Chapter 4, paragraph 4-2C2 (continued)

- c. The data in the following schedule shows PHA dwelling unit (DU) size, PHA fiscal year begin (FYB), PHA submission date, PHA data source based on fiscal year end dates, FY CGP purposes and the completion date for Field Office assessment. 24 CFR 901.100(a) and (b)

Second Phase of PHMAP

PHA Size	PHA FYB	PHA Submission	Data Source	FFY CGP Purposes	Field Off. Assessment
250-499	04-01-92	06-01-92	03-31-92	1993	07-16-92
250-499	07-01-92	06-01-92	06-30-91	1993	07-16-92
250-499	10-01-92	06-01-92	09-30-91	1993	07-16-92

3. For the purposes of the regular submission schedule of the PHMAP, all PHAs, with the exception of 500+ unit PHAs with FYB 01-01-92 (refer to paragraph 4-2C1a, above), shall submit their certifications for their immediate past fiscal year within 90 calendar days after PHA FYB. The regular submission schedule begins with PHAs with FYB 04-01-92. The data in the following schedule shows due dates for the submission of PHA certification for the regular schedule of the PHMAP and for subsequent years, along with the dates for the beginning of

PHA fiscal years. 24 CFR 901.100(b)

PHA Submission for Subsequent Years

PHA FYB	PHA Certifications Due
January 1	April 1
April 1	July 1
July 1	October 1
October 1	January 1

- D. After the initial year of PHMAP implementation, all PHAs shall submit their certifications no later than 90 calendar days after PHA FYB. Refer to the schedule in paragraph 4-2C3, above. 24 CFR 901-100(b)

3/92

4-6

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Chapter 4, paragraph 4-2 (continued)

- E. If a PHA does not submit its certification, or submits its certification late, appropriate sanctions may be imposed, including a presumptive rating of failure in all of the PHMAP indicators, which may result in troubled and/or mod-troubled designations. 24 CFR 901.100(c)

4-3 FIELD OFFICE RESPONSIBILITY.

- A. System for Management Information Retrieval - Public Housing (SMIRPH). The PHMAP module in the System for Management Information Retrieval - Public Housing (SMIRPH) will be utilized to collect information for the PHMAP assessment and to calculate a PHA's PHMAP score. Where data is entered into any SMIRPH module by the Field Office, the same applicable data will automatically be entered into the PHMAP module. It is anticipated that SMIRPH will continue to expand to meet Field Office data collection needs.
1. Non-SMIRPH data. Data that is available from other automated sources, Field Office files, and PHA certification shall be entered by the Field Office into the PHMAP module of SMIRPH. Headquarters is in the process of integrating computer systems so data will automatically flow from non-SMIRPH data into SMIRPH.
 2. Field Offices shall complete the respective PHA PHMAP assessment and the Performance Profile module (Form HUD-52413, PHA Performance Profile, Appendix 1, The Field Office Monitoring of Public Housing Agencies PHAs Handbook 7460.7, as revised) within 90 calendar days after the due date for PHA certification submission (180 calendar days

after PHA FYB). 24 CFR 901.120(a)

- B. In the initial year of PHMAP implementation for the purposes of the CGP, which will be in two phases, Field Offices shall complete the respective PHMAP assessment and the PHA Performance Profile for PHAs, which may include conducting an on-site confirmatory review, designating PHA status, notifying PHAs of their status, and if appropriate, requesting the PHA to submit an MOA or IP in accordance with the time frames in paragraphs 4-2C1, C2 and C3, above. The Regional Administrator has the discretion to review a PHA's score and modification and exclusion requests prior to the transmission of the notification letter to the PHA in accordance with the time frames in paragraphs 4C1, C2 and C3, above. These reviews, if undertaken, will be done in sufficient time to permit the Field Office notifications to be made no later than within 90 calendar days after the due

4-7

3/92

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Chapter 4, paragraph 4-3B (continued)

date for PHA certification submission (180 calendar days after PHA FYB). 24 CFR 901.125(a) and 901.120(a)

- C. After the initial year of PHMAP implementation, all Field Offices shall complete the respective PHMAP assessment and the PHA Performance Profile for PHAs, which may include conducting an on-site confirmatory review, designating PHA status, notifying PHAs of their status, and if appropriate, requesting the PHA to submit an MOA or IP, no later than within 90 calendar days after the due date for PHA certification submission (180 calendar days after PHA FYB). The Regional Administrator has the discretion to review a PHA's score and modification and exclusion requests prior to the transmission of the notification letter to the PHA in accordance with this paragraph. These reviews, if undertaken, will be done in sufficient time to permit the Field Office notifications to be made no later than within 90 calendar days after the due date for PHA certification submission. The data in the following schedule for subsequent years shows the dates for PHA FYB, the due date for PHA certification submission and the due dates for the completion of the respective PHA PHMAP assessment and PHA notification of status for subsequent years. 24 CFR 901.125(a) and 901.120(a)

Field Office Assessment Completion for Subsequent Years

PHA FYB	PHA Certification Due	Field Office Completion of Assessment
January 1	April 1	July 1
April 1	July 1	October 1

July 1

October 1

January 1

October 1

January 1

April 1

- D. If a PHA has not submitted its certification by its due date the Field Office should contact the PHA to determine the reasons for the PHA's nonsubmission, and offer assistance, as appropriate. If a PHA does not submit its certification after being contacted by the Field Office, the PHA may receive a presumptive rating of failure in all of the PHMAP indicators,

3/92

4-8

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Chapter 4, paragraph 4-3D (continued)

which may result in troubled or mod-troubled designations (refer to paragraph 4-2E, above).

- E. A PHA's certification shall be post-reviewed by HUD during a confirmatory review (refer to Chapter 2, paragraph 2-21, of this Handbook) or the next applicable on-site review, audit or survey, but is subject to verification at any time.
1. A confirmatory review may be conducted by the Field Office, on a risk analysis basis in the following order:
 - a. PHA size;
 - b. Borderline mod-troubled designation (5% below and above the percentage for mod-troubled designation);
 - c. Borderline troubled designation (5% below and above the percentage for troubled designation);
 - d. Those PHAs whose PHMAP scores or individual indicator scores indicate a negative trend over a period of three to five years;
 - e. High performer designation; and
 - f. Standard designation.
 2. Appropriate sanctions for intentional false certification will be imposed, including suspension or debarment of the signatories, the loss of high performer designation and a lower total weighted PHMAP score. 24 CFR 901.100(d)
- F. The Field Office shall maintain PHMAP files, including certifications, as open records, available for public inspection for a minimum of three years in accordance with any procedures established by the Field Office to minimize disruption of normal office operations. Field Offices are encouraged to maintain PHMAP files for five years for the purpose of analyzing PHA trends. 24 CFR 900.120(g) and 901.155

