Green Physical Needs Assessment (GPNA) Tool
Frequently Asked Questions (FAQs)
July 2014

Instructions:
This document contains Frequently Asked Questions (FAQs) regarding the U.S. Department of Housing and Urban Development’s (HUD) Green Physical Needs Assessment (GPNA), Energy Audits, related rules and regulations, and HUD’s GPNA Tool. HUD suggests skimming this document and reading questions and answers relevant to your concerns or that catch your eye.

The FAQs are organized into 11 categories. To search for a specific question, press CTRL+F and enter your search term. Note that these FAQs are generalized and typically do not address specific components such as refrigerators, fencing, roofs, etc. For example, if you have a question about entering Expected Useful Life information on a stove, you should search for “EUL,” not “stove.”

Table of Contents

LIST OF ACRONYMS........................................................................................................................ 1

GPNA REQUIREMENTS.................................................................................................................. 1

GETTING HELP WITH THE GPNA TOOL .................................................................................... 10

GETTING THE GPNA TOOL ......................................................................................................... 12

PIC DATA ..................................................................................................................................... 13

GPNA TOOL QUESTIONS ............................................................................................................. 16

SAMPLING ..................................................................................................................................... 19

PRE-ASSESSMENT – PREPARING FOR THE GPNA................................................................. 22

ASSESSMENT – CONDUCTING THE GPNA ................................................................. 26

ENERGY AUDIT ............................................................................................................................. 35

SUBMITTING THE GPNA DATA TO HUD .................................................................................... 42

ANNUAL UPDATE .......................................................................................................................... 44
List of Acronyms

ACC     Annual Contributions Contract
ADA     Americans with Disabilities Act
AMP     Asset Management Project
ARRA    American Recovery and Reinvestment Act
BD      Bedroom
CHAP    Commitment to enter a HAP Agreement
COC    Central Office Cost Center
ECM     Energy Conservation Measure
EPC     Energy Performance Contract
EPIC    Energy and Performance Information Center
ESCO    Energy Service Company
EUL     Expected Useful Life
GPNA    Green Physical Needs Assessment
HA      Housing Authority
HAP     Housing Assistance Payments
HUD     U.S. Department of Housing and Urban Development
HVAC    Heating, Ventilation, and Air Conditioning
MS      Microsoft
MTW     Moving to Work
PCA     Physical Conditions Assessment
PDF     Portable Document Format
PHA     Public Housing Agency
PIC     Public and Indian Housing Information Center
PIH     HUD Office of Public and Indian Housing
PNA     Physical Needs Assessment
RAB     Resident Advisory Board
RAD     Rental Assistance Demonstration
RFP     Request for Proposal
RPCA   RAD Physical Conditions Assessment
RUL     Remaining Useful Life

GPNA Requirements

1. What does a PNA do for a PHA?

A PNA is a systematic review of all of the major physical components of a property, used to develop a long-term plan for addressing the costs of replacement of the components as they wear out. Such a plan can help property owners prioritize work to be done using limited resources with the confidence that they are making spending decisions with as complete a picture as possible. This is an especially valuable tool in annual budgeting, for evaluating the impact of unanticipated circumstances that arise, or for modeling the impact of desired modifications to the property. Evaluating the long-term needs of property helps the owners make decisions about the viability, positioning, and obsolescence of the property. Such planning minimizes loss of
inventory by early attention to correctible conditions and minimizes spending on obsolete stock that could be better used elsewhere. A current example of the potential usefulness of a PNA in public housing is for evaluating the feasibility of participation in the RAD program. PNAs are often used as a repository for physical data on real estate to make the property data readily accessible and usable for property owners. PNAs can be used as a communication tool to stakeholders both inside and outside the PHA. A PNA is a common real estate management tool, and extending its use to public housing brings it closer to the mainstream of real estate.

2. What is the GPNA?

The Green Physical Needs Assessment (GPNA) tool was developed by HUD to provide an instrument for PHAs to record and organize their PNA data in a usable way and to serve as a beginning point for other types of evaluations if desired, such as preventative maintenance plans, marketing studies, health and safety evaluations, appraisals, replacement reserve studies, or a number of other real estate analyses. Tools such as this are generally proprietary to vendors, requiring a contractual relationship to access these benefits. Performing a PNA under any circumstances requires gathering significant amounts of data and making many mathematical calculations. The GPNA tool helps to streamline the process by organizing the data and performing repetitive processes and calculations automatically. The GPNA is provided by HUD without restriction so that all can access this planning resource. In the implementation of the PNA initiative, the GPNA tool automates the required reporting to HUD and provides PNA data to HUD in a format that it can use to benefit all of public housing.

3. What does an energy audit do for a PHA?

Energy audits identify opportunities for savings in operating costs through reduced energy and water consumption and contribute to operating property in a more environmentally conscious manner. There is ample evidence supporting the fact that energy consumption in public housing exceeds average energy consumption of housing in general and that the costs of this consumption are a burden to PHAs and their residents that reduces availability and affordability of housing for the neediest people. When integrated with a PNA, the savings opportunities identified can be placed in the context of the routine replacement needs to be better anticipated and more consistently considered for implementation. Performing a baseline energy audit can also help a PHA make an initial evaluation of the feasibility of pursuing a more comprehensive energy conservation strategy such as through an EPC.

4. Should a PHA hire a contractor to do a PNA or perform it with PHA staff?

The housing authority should review the proposed rules and start evaluating the requirements to assess whether this is something they want to do in-house or contract out. If a PHA meets the requisite qualifications for performing a PNA and has previously performed similar analysis with a staff familiar with the standard industry procedures, that PHA may benefit from conducting the PNA with its own staff. If it is contracted out, the vendor must meet the same qualifications as specified in the rule.
Also, if it is contracted out, PHAs may desire to use that as a training opportunity. They can use the contract process to gather all baseline data, which is a one-time activity. Then, the vendor can be retained to train the staff, so that in subsequent updates and 5-year PNAs the PHAs can do it themselves, if desired. Another scenario might involve the PHA and a vendor working cooperatively on aspects of the assessment to produce the end result—perhaps the staff performs the inspections and the contractor inputs into the tool and provides the analytical work. Thinking about these dynamics in advance can help a PHA to structure a Request for Proposals if it is seeking a vendor.

The PHA has some flexibility in this process to calibrate its involvement according to its budget, skills, and inclination, although it should be recognized that engagement in the process by the PHA will always be required in any PNA process.

5. How do I get an extension on my GPNA due date?

In general, extensions on the GPNA due date will not be considered. If a PHA is severely affected by a natural disaster, the PHA may petition its HUD Field Office for an extension. There is a provision in the proposed rule for petitioning the field office for a delay in performing the energy audit for a period of up to 2 years in documented cases where a qualified auditor cannot be obtained in the timeframe required for the initial GPNA submission.

6. Do the PNA provider and energy audit provider have to be the same?

No, the energy audit and the PNA can be conducted by different entities. For example, the PHA can contract with a third party to conduct the energy audit, and then the PHA can conduct the PNA itself. As a best practice, it is desirable that the energy audit and PNA provider entities can coordinate and communicate with one another.

7. I am a Section 8 only PHA. I have no public housing units. Will I be required to complete a GPNA according to this rule?

No, only PHAs with public housing units in PIC are required to complete and submit GPNAs in accordance with this Public Housing rule. Other rulemaking administered by other HUD offices may impose requirements that a GPNA or similar assessment be performed on Section 8 inventory. PHAs that own and manage Section 8 properties may use the GPNA tool if they desire to assess those properties in the same format but will need to manually enter the development and inventory data. No such data for a Section 8 property assessment should be submitted to HUD via the reporting mechanism of the tool.

8. I manage a small PHA (less than 250 public housing units); will I be required to complete a GPNA? If so, are there streamlined or special accommodations for small PHAs?

Yes, all PHAs with public housing units that include ACC units need to complete a GPNA that covers all of their projects/AMPS and units. The same procedures and requirements apply to all PHAs with public housing units—there are no different procedures for small PHAs. For most
smaller PHAs, the inventory is more homogenous and the components less diverse, which results in a less complex process; however, the process is the same.

9. Do I have to include all of my public housing projects/AMPs?

The GPNA performed using the GPNA Tool will include all AMPs that include ACC units, including Mixed-Finance projects. A PHA may have a number of AMPs that have been reconfigured or abandoned and are recorded in PIC with no units applicable to them. If so, the PIC data file that HUD provides for import into the GPNA Tool will only include those AMPs with ACC units.

10. Do I have to do a GPNA even if I do not have enough money to make all of the improvements?

Yes. The GPNA forms the basis for the PHA’s strategic planning and the establishment of goals and objectives contained in its PHA Plan. It provides the PHA with an estimate that quantifies the capital requirements for the entire portfolio of the PHA, which can and often will be in excess of current funding from HUD. Using these estimates, PHAs can prioritize their needs and look to leverage their capital funds with other funding, to better preserve their housing stock to meet the mission and goals of the PHA Plan.

11. Would HUD be using the GPNA data to determine that a property may need to be removed from inventory or demolished or sold, since cost to repair is too great?

It is not HUD’s intent to use the GPNA for such project-specific determinations. The PNA can be a planning tool for PHAs, and conducting a PNA will help PHAs make decisions on the future disposition of their properties. HUD’s primary interest in collecting realistic summary-level data is to be in a better position to assess national aggregate needs.

12. Are only public housing ACC units inspected and included in the data, even if the non-ACC units are recorded in the set-up?

In Mixed-Finance projects that include both ACC units and non-ACC units, it is only the public housing (or ACC) units that need to be sampled for inspection in most cases. The non-ACC units may be tax credit units, or market rate units, and do not constitute part of the PHA’s public housing inventory; therefore, they are not generally subject to inspection or inclusion in your capital needs assessments. While the non-ACC units may be included in the total unit count reflected in PIC, when the tool performs need/cost projection calculations, it will automatically prorate out those non-ACC units. When designing its assessment and sampling for a mixed finance project, the PHA needs to exercise judgment with regard to its real exposure to capital costs such as the treatment of “floating units” and the potential for non-ACC units to return to the inventory. These considerations help the GPNA serve as a genuine planning tool.
13. When is my GPNA submittal due? Do I have to complete the GPNA before I do my next PHA Plan?

Implementation and due dates for the GPNA will be established when the Final Rule for Capital Fund Physical Needs Assessment at 24 CFR 905 is published and made effective by an implementation notice. Specific due dates for specific PHAs cannot be established until the effective date of the final rule is established, but PHAs will have a minimum of 8 months’ notice from the date of publication of the Final Rule.

Specifically, the initial GPNAs will be due not earlier than 8 months after the publication date of the Final Rule; due dates will be established by separate notice. The due dates will be established as 120 days prior to the end of each PHA’s fiscal year end. The following table summarizes the due dates by fiscal year end.

<table>
<thead>
<tr>
<th>Fiscal Year End</th>
<th>Due Date (pending publication of the Final Rule)</th>
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<tbody>
<tr>
<td>September 30</td>
<td>June 2</td>
</tr>
<tr>
<td>December 31</td>
<td>September 1</td>
</tr>
<tr>
<td>March 31</td>
<td>December 1</td>
</tr>
<tr>
<td>June 30</td>
<td>March 2</td>
</tr>
</tbody>
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PHAs should then use the new GPNA in developing their PHA Plans.

14. Will this new GPNA process apply to Moving To Work (MTW) agencies?

Yes, the proposed GPNA rule specifically and explicitly includes MTW agencies in the requirement. MTW agencies were specifically included because of HUD’s support for the importance of a GPNA for all agencies as a core activity and because of the value of the GPNA data from MTW agencies in providing HUD with a complete picture.

15. My PHA is converting units to RAD; do I need to include the RAD units in the GPNA?

The specific answer depends on the publication of the Final Rule, the due date for your GPNA submission, and whether your inventory under a Commitment to Enter into a HAP (CHAP) ultimately convert to RAD. Also, the inventory in the GPNA tool must match the inventory in PIC at the time the GPNA data are submitted to HUD. In general, inventory that has left public housing by being converted to RAD is not included in the GPNA. Inventory under a CHAP should be included in the GPNA with “0” needs going forward, as that inventory is expected to leave public housing. If some or all inventory under a CHAP does not convert to RAD (e.g., if necessary financing cannot be secured), then the PHA will need to revise the GPNA to account for inventory that did not convert to RAD.
HUD suggests that you work with your Field Office to balance RAD and GPNA requirements and, if applicable, to request an extension for submission of a revised GPNA.

16. Is there any special consideration given to RAD PHAs that have or will have approved projects as a result? How are projects treated where HUD’s Special Application Center has approved units for demolition or disposition?

Special consideration for RAD participating PHAs will depend on where a housing authority is in the RAD process. If they have applied for RAD and received a Commitment to Enter Into a Housing Assistance Payments (HAP) contract (otherwise known as a CHAP), along with the CHAP the RAD Office provides instructions to the housing authority to voluntarily change the status in PIC so that it will no longer be subject to PASS scoring. However, these units will still show in PIC until such time as the RAD transaction is completed at Closing. In the case in which a PHA has a CHAP for an entire AMP, the PHA would not submit any GPNA for that property, unless they fall out of the RAD program and later need to submit the GPNA. In the case in which they have a CHAP for something less than an entire AMP, the PHA would complete the GPNA reflecting a “0” need for the portion with the CHAP and completing data on the portion of the AMP not included under the CHAP.

Once the RAD property is actually removed from inventory (after Closing), the removal will show up in HUD’s PIC downloads and be reflected in the aggregator against which HUD will track compliance. Until that time, while these are in the CHAP stage pending removal, HUD will cross-check the pending RAD list to determine if the Field Office needs to follow up on a submission.

With regard to units approved for demolition or disposition, a PHA must perform a GPNA and include all ACC units, although they can exclude needs for any units approved by HUD for demolition or disposition. If the units have actually been removed from inventory and no longer show in PIC as ACC units, the user can and should remove the units from the GPNA tool as per the instructions in the revised User Guide. If the demolition/disposition is proposed but not yet approved, a GPNA must be completed. Project PNA data must be gathered and included in the GPNA until HUD has approved an application for demolition or disposition. The PHA is not required to perform a PNA on inventory approved for demolition or disposition, but if the units have not yet been actually removed, they are still reflected as ACC units and should be grouped together into an assigned set. A PHA may elect to record costs associated with removal such as demolition costs and potential replacement costs if there will be a long time interval between the time of approval and the actual removal of the units from inventory.

17. How often do I have to repeat the GPNA?

After the initial GPNA, PHAs will be required to repeat the full GPNA every 5 years. In between those full GPNAs, you will need to submit annual updates that report on capital improvements completed during the past year. Subsequent performances of the GPNA can and should use previous GPNAs as a basis.
18. I completed a PNA 4 years ago; do I have to do another one?

Yes. Any PNA information older than 2 years (from the PHA’s GPNA submission due date) cannot be used in the GPNA process per the proposed rule; this interval could be revised in final rulemaking. If your last PNA was completed within 2 years of your GPNA submission deadline and meets the requirements for the GPNA, then you can use that information for this initial submittal. You will have to input the information into the GPNA Tool. If your PNA information does not meet the requirements for the GPNA (e.g., does not assess for 20 years, is not integrated with a current energy audit, provider does not meet qualifications), then you cannot use the information. Even in that case, having the existing “take off” data (e.g., measurements and quantities of physical assets) from any previous PNA will save much work effort in creating your first GPNA. Also, HUD will propose that the final rule extend the 2-year “shelf life” to a longer period to include the data voluntarily submitted early by PHAs (before the publication of the final rule). It will not be known if this is approved, however, until the final rule is published.

19. Can I use my own staff to do the GPNA or must I contract it out? If I can do it myself, what are the qualifications for the person performing the GPNA?

Yes, you can use your own staff if they collectively meet the qualifications as defined in the rule, including having at least one team member with 5 years’ experience performing physical property inspections and cost estimating; demonstrated knowledge of applicable building standards and codes; demonstrated knowledge of energy efficiency practices; and a working knowledge of commonly used computer technology (MS Excel, Office, etc.). PHAs do need to be aware that if they are planning to use this GPNA to support future transactions such as financing, the terms of that transaction may require a third party to perform the GPNA. Some PHAs may also find it more objective to obtain a third party opinion as to the condition of their property.

20. If I contract out the GPNA, does HUD have model language to include in the solicitation?

Yes, there is a sample Statement of Work available in Appendix B of the GPNA User Guide, available on the GPNA Web site.

21. Where do I get the GPNA Tool?

The GPNA Tool may be found at the following location on HUD’s Web site: http://portal.hud.gov/hudportal/HUD?src=/program_offices/public_indian_housing/programs/ph/capfund/gpnatool. See the “Prototype Populated Tool” for a sample that can be used for orientation purposes. Below that section on the page is “PHA Tool for Use” that contains a link to the blank unpopulated tool for installation to your computer. When you are ready to begin working in the tool with your specific PHA data, you may request a data file containing your PIC data for import into the blank tool. The PIC data file may be requested from PHAPNA@hud.gov until it becomes available as a downloadable file from EPIC, expected to be made available during 2014.
22. Is the GPNA the same PNA tool as used for HUD’s RAD program?

No. The Rental Assistance Demonstration (RAD) program uses a different tool, known as a Physical Conditions Assessment (PCA). The GPNA Tool and the RAD PCA (RPCA) are not interchangeable. The RAD program covers both public housing and Project-based Section 8, and the RPCA was developed in the Multi-Family side of HUD. The GPNA Tool was not in approved form when RAD began. Although the programs use different tools, the inspection and analysis cover the same ground, and can be used to input into either Tool (assuming those performing the inspection and analysis meet the requirements of both programs). The RPCA for the RAD program requires substantial additional narrative and photographic documentation, and has a different approach to energy conservation measures and requires a larger sample size than the public housing PNA. Please also refer to Question 9 above.

23. If I am also applying for RAD, do I have to do a second, separate GPNA?

If you are applying for conversion of public housing to Project-based Section 8 under the Rental Assistance Demonstration (RAD) program, you will need to use the RAD program’s Physical Conditions Assessment (RPCA) Tool during the 6 months after receiving an invitation to enter into a Commitment to enter a HAP Agreement (CHAP). Currently, if you need to complete your GPNA prior to such time as the project/AMP converts to Section 8 under RAD, you will also need to include the proposed RAD units and building data in the GPNA format at the appropriate time, but for the proposed RAD units you may enter $0 as the Need—since the units will likely leave the public housing inventory in the near term. While the GPNA Tool and the PCA are not interchangeable, if those conducting the inspections and analysis meet the GPNA and RAD requirements, then PHAs can enter information based on the same inspection into both tools, which would save time and money. Please also refer to Questions 9 and 15 above for a more detailed discussion of this issue.

24. Where do I get the funds to do the GPNA? Will HUD give me additional Capital Funds?

The GPNA is an eligible expense under the Capital Fund. As such, PHAs can include the cost of the GPNA in any open, unobligated Capital Fund grant. No additional funding is provided over and above the Capital Fund grant.

25. Can I pay for the GPNA from my Operating Fund/reserve?

Yes, this is an allowable expense under the Operating Fund/reserve.

26. Can I submit a paper version of the GPNA to HUD?

No, only electronic submissions are permitted. The data are being consolidated into an aggregated database to help assess the total need for capital improvements in the nation’s public housing portfolio. All GPNA submittals must be on the automated reporting data file that the GPNA Tool produces.
27. I have a project that is proposed for demolition/disposition, do I have to perform a GPNA? Do I have to include the proposed demolition/disposition units in the GPNA?

You must perform a GPNA and include all ACC units, although you can exclude any units approved by HUD for demolition/disposition. If the demolition/disposition is proposed but not approved, a GPNA must be completed. Project GPNA data must be gathered and included in the GPNA until HUD has approved an application for demolition or disposition. The PHA is not required to perform a GPNA on inventory approved for demolition or disposition. A PHA may elect to record costs associated with removal, such as demolition costs and potential replacement costs, if there will be a long time interval between the time of approval and the actual removal of the units from inventory.

28. What if I have a lot of projects and need to have several people performing the assessment?

Key input sections of the tool including the cost libraries, inspection forms, and cost projections can be exported to Excel spreadsheets and worked on by others independently. The resulting modified spreadsheets can then be imported back into the tool to populate it with those inputs. However, only spreadsheets originally generated by the tool can be imported into the tool. Excel spreadsheets generated independently by the PHA or others will not be accepted by the tool. Excel spreadsheets exported from one tool cannot be imported into a different tool. There is also a Client Server version of the GPNA Tool designed for use by larger PHAs that permits multiple persons to work on data entry of GPNA results at the same time. GPNA inspections and data entry can be performed by multiple people; there is not a requirement that one person carry out all aspects of the GPNA. The Client/Server version may be downloaded from the Web page but requires a password that can be obtained by making a request to PHAPNA@hud.gov.

29. What Section 504 information do I have to include?

If the PHA determines it needs to undertake physical improvements in order to comply with Section 504 and related requirements, the cost of those physical improvements are included in the GPNA in the Accessibility category.

30. Will HUD use the GPNA to determine compliance with Section 504 of the Rehabilitation Act?

No. The GPNA is not a compliance vehicle. Information entered into the GPNA on Section 504 needs is gathered for the purpose of estimating the total capital needs of the project(s). Those costs are reported in summary to HUD’s data aggregator.

31. Is the GPNA used to comply with local codes?

While all housing authorities are required to comply with all applicable state and local codes, the GPNA is not designed as or intended to be a code compliance tool.
32. Do I need to notify the residents before doing the GPNA inspection?

Yes, as provided in 24 CFR 966.4(j), the PHA must provide a written notice to the residents whose units will be inspected 2 days in advance of entry into the units. No notice is required to the residents whose units are not being inspected.

33. Do I have to make the GPNA available to the public? If so, how am I required to make it public?

The PHA must make the GPNA available to the residents and the Resident Advisory Board (RAB) at the time it is submitted to HUD. The GPNA Tool produces appropriate summary reports. There is no requirement to “publish” the GPNA results. Laws vary by state as to whether such documents are freely available to the public, and PHAs need to comply with any applicable state or local ordinance in this regard.

34. What will happen to a PHA if the GPNA is not submitted to HUD on time?

HUD anticipates that the vast majority of PHAs will understand the need at both the housing authority and HUD level for development of capital needs assessments, such as the GPNA. In extreme cases where a PHA is not cooperating with this requirement, the PHA faces a number of sanctions similar to those currently available to HUD under the Capital Fund. These sanctions could include, but are not limited to, issuance of a Corrective Action Order; reimbursement from non-federal funds; limit, withhold, reduce or terminate assistance under the Capital Fund or Operating Fund; and debarment or suspension.

35. Where can I find a copy of the final PNA rule?

It is not published yet—nor is the final energy rule published yet. The draft PNA Rule can be found at http://www.regulations.gov/#!documentDetail;D=HUD-2011-0085-0001 and the draft energy rule can be found at http://www.regulations.gov/#!documentDetail;D=HUD-2011-0142-0001. You may also read the text of public comment received on these two proposed rules. When final, these two rules are anticipated to be combined into a single rule for simultaneous implementation. When published, the final rule will be made available on HUD’s Web site and the GPNA Web site.

**Getting Help With the GPNA Tool**

1. If I have a question about the GPNA or the software, whom do I contact?

First check the Frequently Asked Questions and other resources available on the GPNA Web site. If you cannot find an answer to your question, contact the PHA’s local HUD Field Office. PHAs can locate their local HUD Field Office at the following Web address: http://portal.hud.gov/hudportal/HUD?src=/program_offices/public_indian_housing/about/field_office.
2. What training will HUD provide on the new GPNA?

HUD has held several Web-based trainings and two full-day training sessions in Washington, DC, for PHAs and for GPNA vendors. The dates for future trainings will be emailed to PHA executive directors and will be posted on the GPNA Web site: http://portal.hud.gov/hudportal/HUD?src=/program_offices/public_indian_housing/programs/ph/capfund/gpnatool. Training sessions that are already completed are archived by date (search on “physical needs assessment”) for later viewing, as will also be the case for any future training, at: http://portal.hud.gov/hudportal/HUD?src=/press/multimedia/videos http://portal.hud.gov/hudportal/HUD?src=/program_offices/public_indian_housing/programs/ph/capfund/learningtools.

3. Will training on the GPNA be provided by others like the industry groups and private contractors?

A number of private vendors and industry groups are providing training on the GPNA, often for a fee. Those organizations will make their own decisions with regard to GPNA training. Industry group and private contractor trainings are independent of and not approved or endorsed by HUD. GPNA users considering such for fee training are encouraged to first explore the available free resources at HUD’s Web pages. Please note that there is no HUD-required “GPNA certification.”

4. Is HUD offering a certification course in GPNA?

No. PHAs may contract with any qualified vendor to perform the GPNA with its qualified staff. Qualifications for performing a GPNA will be included in the final rule and will include requirements that at least one team member has at least 5 years’ experience performing physical property inspections and cost estimating; demonstrated knowledge of applicable building standards and codes; demonstrated knowledge of energy efficiency practices; and a working knowledge of commonly used computer technology (MS Excel, Office, etc.).

5. Where can I go to find more detailed information on the new GPNA?


6. What should PHAs be doing in advance of the final rule to prepare?
The PHA should review the proposed rules and start evaluating the requirements to assess whether or not this is something it wants to do in-house or contract out.

Here are some suggestions for additional preparation: Review the existing training videos and other resources on the GPNA Web site and download at least the prototype tool to get familiar with it. You should also download and review the GPNA User’s Guide. Install a blank GPNA Tool from the Web page and import a PIC data file for your specific PHA into it so that you can verify that the PIC data are correct or initiate corrections in PIC. Work with your Field Office if the PIC data are not accurate. There is a substantial amount of project/AMP level data gathering that is required for any PNA process, including architectural take offs, that requires quantities, component lists, costs, age, and useful life of building components. The PHA should also begin to think about the sample units that will be used. See the discussion on Page 42 of the GPNA Users Guide. This is also the time to begin thinking about potential property improvements or modifications that could be considered during the GPNA process. If a PHA does decide to engage a third-party GPNA provider, it may want to do some mock inspections to get ready for them. Begin thinking about the composition of sets of like kind properties and units.

**Getting the GPNA Tool**

1. **Where do I get the GPNA Tool?**


   See the “Prototype Populated Tool” for a sample that can be used for orientation purposes. Below that section on the page is “PHA Tool for Use” that contains a link to the blank unpopulated tool for installation to your computer. When you are ready to begin working in the tool with your specific PHA data you may request a data file containing your PIC data for import into the blank tool. The PIC data file may be requested from PHAPNA@hud.gov until it becomes available in EPIC for direct download by PHAs.

2. **Is the GPNA tool Mac compatible?**

   The GPNA tool is not Mac compatible. The tool was developed and designed for use in the Microsoft operating environment. There are Apple Mac products with dual operating systems that can run Microsoft Access database programs within an Apple Mac environment. If your Mac is so equipped, it should be able to run this software.

3. **Can I download the GPNA software to my iPad?**

   At this time, HUD does not have a GPNA app available for the iPad, iPhone, or other mobile devices. You may be able to use a third-party app to work with the Excel data entry sheets included in the GPNA Tool on your iPad.
4. Can I use a smartphone or tablet to complete the GPNA?

The GPNA Tool is based on Microsoft Access and typically only works on a desktop or laptop computer. At this time, HUD does not have a GPNA app available for mobile devices. You may be able to use a third-party app to work with the Excel data entry sheets included in the GPNA Tool on your smartphone or tablet.

5. Is there an instruction manual on how to use the GPNA software?


6. Is a paper copy of the tool available?

No. The tool is designed and intended for electronic use, not paper-based use. However, if it is useful, you may print out various pages including the inspection forms, cost libraries, and cost projections. These paper forms could be used as worksheets for later input into the tool or into Excel spreadsheets exported from the tool. The tool produces multiple printable reports on the reports menu page that are useful for sharing the results with others.

7. What is the date of the latest available tool?

As of June 2014, the current tool that is available on the HUD Green Physical Needs Assessment (GPNA) Tool Web page is version 1.0 dated 07/02/12. Revisions to the tool are in progress, and a new version will be forthcoming and posted to the Web page when it is available.

**PIC Data**

1. Where do I go to download PIC information?

At this time, the PIC data file can be requested by sending an email to PHAPNA@HUD.GOV. During 2014, PIC data files will be made available for direct download from EPIC.

2. How do I get incorrect PIC information corrected?

Once you have downloaded PIC data, if you find any incorrect information in the download, work with your local HUD Field Office to ensure that the data are corrected and approved by HUD, as applicable. Please be aware that it can take some time to update data in PIC before they are available in a revised PIC data file to populate the GPNA Tool. Start this verification process early.
3. Can I meet HUD’s requirements to complete my GPNA if my PIC data are incorrect?

No. If the inventory data in the GPNA submittal report are at variance with the current PIC data at the time of submission, the GPNA submittal will be rejected. The best course of action is to begin working in the GPNA Tool with a correct PIC data file. It is possible to revise the inventory data within the tool; however, you are strongly advised to consult with your HUD Field Office before doing so (note that PIC data must be updated separately to match inventory changes in the GPNA Tool; otherwise the GPNA submittal will be rejected). The data involved is only the inventory data (AMPs, number of units, bedroom sizes, number of buildings); the occupancy data is not included in the data import and is not relevant to the PNA process. Also note that submission is made by AMP, so it is possible to work on AMPs in the GPNA tool that are not affected by inventory changes and to submit GPNA data on them. In that circumstance, the user would complete the GPNA for AMPs with corrected PIC data in a separate tool.

4. Why do I have to request and import the PIC data into the tool?

PHAs will begin their GPNAs at different times and the data population process provides the PHA with the flexibility to begin the process more reliably on its timetable.

5. Can I download the PIC data into the GPNA Tool to determine if the data are correct and conduct further testing?

Yes. You may want to download and check your current PIC data and test the Tool by loading the PIC data into a blank GPNA Tool. Later, when you are ready to conduct the PNA, you can download a new blank GPNA Tool and updated PIC data.

6. If you have an established GPNA in place and your building count in PIC changes, can you bring in the new PIC information into the GPNA, or would you have to start over?

The inventory in the GPNA Tool must match the PIC inventory at the time the GPNA is submitted to HUD. Once a PIC data set has been imported into a tool, it is not possible to import another PIC data set into the same tool, even for the same PHA to update it. HUD strongly suggests that PHAs check the accuracy of their PIC data before beginning the GPNA and that staff conducting the GPNA coordinate with PHA staff who maintain and update PIC.

Changes to inventory in the GPNA Tool will not be reflected in PIC, and changes in PIC will not appear in the GPNA Tool unless a new PIC file is loaded into a new copy of the GPNA Tool. There are mechanisms to make changes in the GPNA Tool to adjust inventory that are relatively easy for a few small changes (see the edit functions on the control panel below the Development/AMPS column).

If there have only been minimal changes to the PIC data, changes can be made manually in the GPNA tool. Please see the July 2013 revised User Guide (available by request to HUDPNA@hud.gov) for detailed instructions on how to revise the PIC data in the GPNA Tool. Also see the June 3, 2014 training video in the archive. Note that there are two sets of instructions—the first is to change details of existing buildings and units, and the second is to
add or delete buildings or units. Please note that if building and unit counts in the GPNA Tool do not EXACTLY match what is in PIC at the time of the upload, the report will be rejected. Changes to unit details, such as bedroom size and address information, will not stop a successful upload.

With respect to demolition and disposition, a PHA must perform a GPNA and include all ACC units, although they can exclude needs for any units approved by HUD for demolition or disposition. If the units have actually been removed from inventory and no longer show in PIC as ACC units, the user can and should remove the units from the GPNA tool as per the instructions in the revised User Guide. If the demolition/disposition is proposed but not approved, a GPNA must be completed. Project PNA data must be gathered and included in the GPNA until HUD has approved an application for demolition or disposition. The PHA is not required to perform a PNA on inventory approved for demolition or disposition, but if the units have not yet been actually removed, they are still reflected as ACC units and should be grouped together into an assigned set. A PHA may elect to record costs associated with removal such as demolition costs and potential replacement costs if there will be a long time interval between the time of approval and the actual removal of the units from inventory.

7. My PHA recently combined units (e.g., converted three units into two accessible units). This change is not reflected in the PIC data. What should I do?

Combining units is handled in different ways on the PIC level. Some PHAs retain the original unit count. You should determine how the PHA is handling this in its PIC inventory. If the PHA is planning to remove units from inventory, you can edit the tool. However, you must be aware that when the GPNA is submitted to HUD, the inventory data in the tool must match the inventory information that is in PIC at the time of submittal. Merged units are sometimes still recorded in PIC as non-ACC units and should be deleted from the tool by the user. Editing inventory information in the tool does not change PIC. Editing of inventory in the tool is done with the edit selections on the control panel below the Development/AMPS column.

8. My PHA has non-dwelling buildings, but when I import the PIC data into the tool, these buildings are not included. How do I deal with these non-dwelling buildings for the GPNA?

PHAs may have accessory non-dwelling buildings for maintenance, offices, storage, community centers or other purposes. These buildings may or may not be listed in PIC; they will not be included in the PIC data imported (downloaded) into the GPNA tool. If the needs for this building(s) are accounted for by the PHA along with the property on which they are located, it is recommended that the PHA account for those needs in the GPNA. Note that you should not account for Central Office Cost Centers or other buildings not under your ACC in this manner.

You will need to add the building into the GPNA tool. To do this, navigate to and select “Edit Development Buildings” under the Development/AMPS column on the Control Panel. Select “add building” at the bottom of the page. A new line will open on the list of buildings named “new building.” You should rename the building to be more descriptive for you. You then select the type of non-dwelling structure from the dropdown menu under “type”—choices are Maintenance, Office, Storage, Community Center, and Other.
Once the building is added to the GPNA tool, the user navigates to Control Panel > “add building set” and selects “non-dwelling structure” from the structure type dropdown menu, then enters a building name. The user can then navigate to the Control Panel, select the newly added building on the building sets list, go to “edit building set,” and assign a building(s) to the named set. An inspection form can then be created for it.

Adding a non-dwelling building will not affect validation with PIC at submittal and adding this building in the tool will not revise PIC.

**GPNA Tool Questions**

1. What kind of software is the GPNA Tool?

   It is a Microsoft Access database application.

2. What are the computer system requirements for installing the GPNA Tool? How large is the GPNA file?

   The user’s system should be a Microsoft operating system XP or later with Windows software Office 2007 or newer. Although the tool is built in Microsoft Access, the user is not required to have Access software to download the tool from HUD’s Web page. The downloaded tool has integral software that installs on the user’s computer that enables its use regardless of whether the user has Microsoft Access. The file size of the downloaded tool is in the range of 70 MB and is generally too large to email even in a compressed or zipped file. PHAs using outside vendors need to be sure to obtain a disc or hard copy of the tool at the end of the contract for safekeeping. Subsequent required annual reports are produced from the tool. HUD will not have the capability to recreate a tool with the PHA’s entered data as HUD only receives an extract of the data.

3. Can I work on GPNAs for multiple PHAs on the same computer?

   Yes, GPNAs for multiple PHAs can be managed on one computer, but each copy of the GPNA Tool can be used for only one PHA. Vendors serving multiple PHAs, or entities that manage multiple PHAs, will need a separate copy of the GPNA Tool for each PHA. Each of the copies must be renamed from the default name of the GPNA Tool (GreenPNAfull.accdr) to have a unique name. Please email HUDPNA@hud.gov to request a document with instructions for setting up multiple live versions of the GPNA Tool on one computer. Note that all entries for each PHA must be made in the same GPNA Tool.

4. Can multiple users working on the GPNA for a single PHA use a GPNA Tool at the same time?

   Yes, multiple users working on the GPNA for a single PHA can use the GPNA Tool simultaneously, but they must use a special version of the GPNA Tool software referred to as the Client/Server version. PHAs, or their vendors, can request the Client/Server version that allows multiple users to work in the same GPNA Tool simultaneously. To request this version, visit the
When a user has obtained and installed the Client/Server version on their server, and linked client versions to the server version on its shared network drive, then several users can work in the same tool simultaneously. Entries by each “client” will be reflected in the linked server version as well as in all other client versions linked to that server version.

This application is most useful for a well-established team of users with well-understood input protocols that minimize the possibility of entries being inadvertently modified or deleted.

5. How do I backup and protect my GPNA data?

A PHA should always observe best practices in preserving agency data and backup data frequently, both onsite and offsite. Depending on the size of the PHA and the sophistication of its hardware systems, data on the server may be backed up daily on the same drive, or to a “cloud.” Given the potential for failure of hard drives, use of the “cloud” backup systems should be given serious consideration. For data on the server, the technician supporting the systems may be charged with backing up periodically off site, or onto media storage placed in a fireproof safe on site, or both. Of more concern are instances where the data are stored on individual staff laptops or desk computers that are not linked to a server. PHAs may wish to consider developing a protocol in those instances where a backup is made daily (e.g., onto a thumb drive) during the time frame the GPNAAs are being prepared, and then any time updates are made. Good practices include having more than one external storage device and rotating them and/or using a “cloud” backup system. The default location name of the file that contains all of the live GPNA data that need to be backed-up and protected is C:\Green PNA\GreenPNAFull.accdr. This may differ in the case of vendors who follow the procedure to have multiple live GPNA Tools on one computer.

6. How do I know, as the housing authority, that I’m getting a completed HUD tool if I have a vendor do it for me?

The tool is based on a Microsoft Access database. This tool can be opened and manipulated using a Runtime version of Access (available to download for free from Microsoft) without requiring the full Microsoft Access tool. The vendor needs to give the client a copy of the completed tool, either in a zip file, on a thumb drive, or on a CD. Once the PHA opens the copy of the tool, they can generate from it the required XML file for submission to HUD, if the vendor did not provide that file independently to them. The PHA should review the “Dashboard” page first to confirm that all of the units in its inventory are reflected there. The PHA should next review the needs for each development/AMP to determine their adequacy, comprehensiveness, and accuracy. The tool has features that the vendor can use to email interim reports to the PHA as data are being entered into the tool so that the PHA can comment.
7. Do I install a copy of the tool on every computer?

Unless you are using the Client Server version of the tool, it is not recommended unless you maintain strict protocols for data entries and can maintain the integrity of the tool from which you report. It is not possible to directly “cut and paste” from one tool to another although some key input sections such as the cost libraries, inspection forms, and cost projections can be exported to excel spreadsheets and imported into a copy of the tool for the same PHA.

8. Does the software provide a random sampling of units to be inspected within each development that takes into account the different building and unit types?

No. The PHA should select the units that will be sampled based on the protocol described in the GPNA User Guide. The tool will automatically group buildings of like type and units of like bedroom count to facilitate the creation of sets. The careful design of sets and samples is very important to a reliable result.

9. How do I keep track of the annual updates and 5-year full GPNA due dates?

The GPNA and update will always be due on the same date (at least 120 days prior to the PHA fiscal year end). PHAs may wish to program a reminder into a calendar or project management program, such as Microsoft Outlook, or include GPNA and annual update due dates with other compliance due dates. Early submission does not change subsequent due dates.

10. Why are some Line Item Components and descriptions so general?

The predefined line items for the various components are designed to cover a broad range of component types. If you are not able to find a Line Item that fits your situation, you can Add Line Items more specific to your property. This is done by selecting “Add Line Item” from the Perform Action bar at the bottom of the Master Cost Library page. This action will add the same line item to the applicable inspection forms and cost projections. When adding a line item you should assign it a line item number that conforms to the numbering convention of the tool so that the item will be calculated within the correct category. For example, site components are in the 1000 number series, building exterior components are in the 2000 number series, etc. You can also revise the existing line item descriptions to better fit your specific component. At the end of each line on the Master Cost Library is an “edit” button that opens an editing page. It is important that all component costs are accounted for, but ultimately only summary cost data are sent to HUD. However, it is advisable that conventions are followed in adding and modifying line items to make future revisions easier.

11. What kinds of files are generated by the GPNA Tool?

The submission to HUD is an .xml data file that is machine readable. The basic information that is transmitted in the data file is the summary level information found on the tool “Dashboard” page. The GPNA can also generate many other useful text reports and export them as Excel files and PDFs. For example, on the Reports page of the GPNA, and for portfolio-wide reports, simply click on the “Export to Excel” button for the data you want. For AMP-specific data, first
select the AMP for Reporting at the top of the Reports page, and then click on the “Export to Excel” button for the data you wish to export.

12. Will the GPNA software provide me with reports for the PHA and its Board to review?

There are numerous reports available within the GPNA software, at both the portfolio level and for specific developments (AMPs). At the portfolio level, there is an overview report listing each development and spreading the needs across the 20-year timeframe. This same report provides a break-out by Category of Need (e.g., site, exteriors, systems, common areas). Several components are also listed on this report, such as Windows and Roofs. Other portfolio-wide reports look at GPNA Needs by Year, Needs by Needs Type, Needs by Category, and Needs by Component.

At the AMP level, you must first select the AMP you want to report on, and you may then focus on 16 different areas, such as AMP Sustainability Projection, AMP Marketability Projection, or AMP Needs by Year. These pre-designed reports can be viewed on screen, printed, or exported as PDFs or Excel spreadsheets. From the data exported to Excel spreadsheets, you can customize your own reports or perform further analysis.

13. If I have multiple properties in an AMP, and I am editing projections on a line item and I have several line items with several IDs, can I tell which line item I am editing?

No, it is not possible in the software to differentiate line items by property within the same HUD numbered development/AMP.

14. Will the GPNA just reflect my current needs or does it look at the needs in the out years? How many years does it look at?

The GPNA, when properly completed, projects the cost of immediate physical needs, as well as costs for project capital improvements for each of the next 20 years. The set-up information provides an Expected Useful Life for each component, and the inspector assigns a Remaining Useful Life to each element inspected. So, for example, if a refrigerator has an Expected Useful Life of 10 years (as entered on the cost library), and the inspector determines a Remaining Useful Life of 5 years based upon observation (as entered on the inspection form), then the GPNA will show the need to replace this appliance in Year 5, and 10 years after that as well (Year 15). In this way, the GPNA shows not only the next time an item needs repair or replacement but also shows every time it will recur within the 20-year timeframe.

**Sampling**

1. How many buildings and units do we have to inspect?

Selection of inspection samples can have a significant impact on the accuracy and usefulness of the GPNA. The key to careful sample selection is to exercise judgment in considering a group of buildings and units to inspect that reasonably represent the average configuration, components, characteristics, and condition of all of the units or buildings in the set. A minimum of 20 percent
of all the Buildings in each Building Set and a minimum of 10 percent of the units in each unit set must be inspected. Of course, the greater the percentage of units and buildings that are inspected the more precise and comprehensive the result will be. PHAs should devote some early care to the sample selection whether they are performing the GPNA with staff or contracting. If contracting, the vendor will rely upon the PHA’s knowledge of the general conditions and configurations and to the extent this is conveyed in the RFP documents. If the PHA can provide a reasonable summary of the inspection quantity in the RFP, they may have fewer misunderstandings in the execution of the work.

The GPNA requires a minimum sample of 20 percent of all the Buildings in each Building Set and a minimum sample of 10 percent of the units in each Unit Set to be inspected, which—in many, but not all cases—will result in a statistically valid sample. The specific GPNA sampling protocol is found in the GPNA User’s Guide. Under those provisions, the inspector is required to inspect a sufficient sample of each unit type, building, and property system (e.g., HVAC, roof) to be able to state with confidence the present and probable future condition of the total property (i.e., a statistically valid sampling). This requires observing a sufficient number of units and common areas in each building and each variation of building and/or unit type. Factors which must be considered in determining a statistically valid sample include: building age (including various development phases within the same project); building type (e.g., garden, row house, elevator); building construction materials; unit type (e.g., studio, 1-bedroom); unit size within type (e.g., 512 sq. ft. 1-bedroom vs. 730 sq. ft. 1-bedroom); unit occupancy (e.g., elderly, handicapped, family); unit equipment or amenities (e.g., air-conditioned with in-unit equipment).

Consider the following conditions when determining your inspection sample. At least one of each type of unit (by bedroom count as well as by configuration) must be inspected even if that results in a Set containing only 1 unit. For example, a building may have some three-bedroom units that have a second bath that would make them different. Units with characteristics potentially affecting condition need to be included in the sample, such as top-floor units, basement units, ground-floor units, or end units. You may need to expand the inspection sample in cases where units are not reasonably uniform in their condition. For example, you might have a percentage of your units that have renovated kitchens and a remainder that is not renovated. Your sample needs to reflect that proportion. The user also has the flexibility to adjust quantities and components at the cost projection stage by direct entry, to reflect a proportion of specific components the user knows it has but that may not be reflected in the inspection sample.

Each project site must be inspected in its entirety. A single building on a site would be inspected in its entirety on the exterior. On projects with multiple buildings, a minimum of 20 percent of the buildings should be inspected in each Building Set; in the case where the buildings are essentially identical, of the same age, and similar condition. This percentage of buildings and Building Sets to inspect will increase much in the way the unit sample size increases (based on consideration of significant building characteristics). A single common building system would be inspected in its entirety, such as a boiler. A reasonable minimum sample of multiple components in the same systems component category would be 20 percent and up to 100 percent where conditions are known to vary.
Unique non-dwelling spaces within a building such as a building lobby/mailroom, the main mechanical room, the elevator penthouse, and the community room should be inspected in their entirety. Spaces such as hallways and laundry rooms can be sampled at 20 percent where conditions are known to be essentially identical and up to 100 percent where conditions are known to vary.

The GPNA tool has the capabilities to be a central repository of all kinds of data, such as vendors of components and locations of specific models of an item, and supporting documentation, and photos can be attached to specific line items. If a PHA chooses to use the tool this way, there is nothing to stop a PHA from exceeding the minimum sample or even doing a 100 percent inspection with the tool. The GPNA Tool will automatically scale the cost summaries forwarded to HUD based on whatever sample is used.

Other data stored within the GPNA Tool will not be sent to HUD, but PHAs can choose to use all the capabilities of the GPNA Tool if they are judged to serve the PHA’s needs. It is very important that the copies of the data file be backed-up and stored in multiple secure locations because HUD does not have all the data stored in your GPNA Tool and cannot help you recreate it if there is a computer issue.

2. How do you sample the universe of energy audits?

For energy audits, the sample set is not specified. Generally in energy audits, a percentage of units may be sampled that is less than the 10-percent sample protocol for a PNA. Often, when completed in conjunction with the PNA, however, the same units are sampled for both purposes.

3. What is my inspection sample for 3-bedroom units if there are 2 very different unit configurations?

If the difference in “configuration” is simply that of the floor plan, and the square footage is nearly the same (e.g., plus or minus 10 percent), but the appliances, equipment, windows, flooring, doors, etc., are of the same age and materials, then the two configurations can be treated as one Set of 3-bedroom unit—at least 10 percent of this Set of 3-bedroom unit should be inspected. If the different configuration results in significant other changes (e.g., townhouse versus flat; different number of bathrooms; different types of HVAC systems; etc.), then they should be treated as different unit types and thus a minimum of 10 percent of each type (Set configuration) should be inspected and included in the GPNA.

4. How do I complete the GPNA when I have multiple developments and different structure types in the same AMP?

The GPNA software accommodates the inclusion of different sites and developments within the same Development/AMP. A Development/AMP can be divided into individual sites, and each site can be divided into different building sets (e.g., walk-up versus multi-family or high rise). Different unit types can also be grouped within each Building Set, and different types of common areas can be identified and inspected separately.
5. What if I have 100 scattered site Single Family Dwellings and they are all different?

The sample selection for a scattered site inventory is perhaps the most challenging judgment for any GPNA process. The first consideration would be whether all these properties are truly different? If there are truly 100 scattered site Single Family Dwellings that are all different, then you must create 100 Building Sets and inspect 100 percent of the Buildings and units, since each Building and unit set is different. If half of them (50) are single story wood frame houses on ground slabs with asphalt roofs, three bedrooms, and two baths built in the 1960s, with square footage that is plus or minus 10 percent, then that might be enough similarity to represent a Building Set. At least 20 percent of these Buildings (10) and 10 percent of these Units (5) must be inspected. The user needs to determine whether the overlap between unit inspection components and building exteriors/systems inspection makes it more practical and accurate to simply inspect all of the interiors (10 instead of 5 in this case). For some PHAs, a 100-percent sample of these scattered site properties may be the most appropriate choice, based upon the diversity of the buildings and perhaps management considerations, such as a policy to periodically inspect all units in the inventory.

**Pre-Assessment – Preparing for the GPNA**

1. What types of information will I have to collect before actually doing the GPNA itself?

The [User Guide](#) provides some specific guidance under Phase I: Pre-Assessment—Preparing for the GPNA.

2. Where do I get the costs to enter into the cost library?

This is discussed in the Cost Library section of the User Guide. HUD does not require or mandate a specific cost index. PHAs may select any rational and supportable cost index that suits its needs, including a custom cost schedule that the PHA has developed based upon its known local costs. If a PHA is performing a GPNA for the first time and has not selected a cost index or does not have a cost list for the items it typically buys for its inventory, several cost indices are commercially available. For example, R.S. Means, Marshall & Swift, and others sell national cost index information updated annually with geographic adjustments that cover most components typically found in public housing (see the “Repair and Remodeling Cost Data” volume and note that HUD does not endorse any specific cost index or provider). Most PNA vendors subscribe to cost index services that they can recommend and provide if the PHA is contracting this work.

3. How can I alter the pre-populated component entries in the cost library?

You can use the edit box at the end of each line in the Master Cost Library to alter the components on a line-by-line basis. For instance, if the PHA measures windows by unit count, you may alter this line from the populated square footage count to instead reflect a unit count. Note that a PHA should only add data to components that apply to the PHA. The edited information will be migrated to each AMP cost library and to each inspection form.

It is okay to have unused lines in the cost library. There is not a function to delete lines. If you find you have lines you will not be using, you can go to the edit box in the master cost library (at the end of each line there is an edit box) and you can rename and fully edit that line to represent a component you will be assessing that may not already have a pre-populated line. Any line item that does not calculate in the cost projection will not show up there (if you do not put in a cost/quantity/RUL/EUL, the item will not compute, and that line will not show in the reports or cost projection).

5. How do I determine if an item or component is a life cycle component?

The PHA determines what components are reasonable to include for its long-term planning with the threshold being components that are planned to be replaced using Capital Funds. In other words, any component that the PHA plans to use Capital Funds to replace is a life cycle component, and beyond that some PHAs may elect to track components at a more granular level for planning purposes.

6. How do I determine the EUL for an item or component?

Estimated Useful Life needs to be derived from a supportable source or index. Some PHAs have even gathered their own information about this life cycle data—for example, on appliances—which would be considered acceptable as well. There is a lot of flexibility for PHAs to use their own judgment in selecting EUL values for their local circumstances. Typically, manufacturers provide EUL information for their products. Various organizations involved in the construction and housing industries publish EUL tables. There are many different varieties of PNAs, and many systems exist for listing the expected useful lives of the different components. HUD does not offer an opinion on which of these are good systems and which are not, as long as the system is supportable and is commonly used in the industry.

7. Is the Fannie Mae 4099.F form an acceptable source of Estimated Useful Life data?

The Fannie Mae 4099.F form, which is an attachment to the Fannie Mae protocol, is an acceptable source of Estimated Useful Life data. These are copyrighted materials, and HUD has no affiliation with Fannie Mae. Any copyright must be considered.

8. If a project is converting all units to RAD, does the project need to complete the GPNA? Also, if a project is only converting some of the units to RAD and the remaining will stay in public housing, will the RAD units need to be part of the GPNA?

The public housing GPNA requirement will not become effective until the publication of its final rule. PHAs that have entered RAD and whose converted units are no longer recorded as ACC units in PIC as of their GPNA submission due date (and are reflected in the PIC data set provided by HUD for import into the GPNA tool) are not required to make the PNA submission from the GPNA tool for that portion of their inventory that has left public housing for RAD. PHAs that
have been awarded a Commitment to Enter into a HAP (CHAP) under RAD as of the due date of their public housing GPNA will be required to make the PNA submission from the GPNA tool accounting for the entire inventory of units remaining in public housing (and remaining reflected in the PIC data set provided by HUD for import into the GPNA tool) but recording “0” needs for that portion under the CHAP. If the entire inventory of any AMP is under a CHAP as of the GPNA due date, no submission will be required, as it will be considered likely that the entire AMP will be leaving public housing. Should public housing inventory under a CHAP not ultimately convert to RAD and remain in public housing, a GPNA submission will become required. Any subsequently required submission must be made from the automated reporting feature of the GPNA tool. Information from a RAD PCA may be used for the submission, but it must be migrated to the GPNA tool.

9. How do I account for the needs of maintenance buildings located within and serving a particular site?

PHAs may have accessory non-dwelling buildings for maintenance, offices, storage, community centers or other purposes. Some such structures are assigned to COCC. COCC property and other buildings that are not under the PHA’s ACC should not be included in the GPNA. If these structures are under the ACC and are assigned to a project/AMP, they should be reflected in the GPNA but will not be included in the PIC data imported into the GPNA tool. In order to account for these needs, you will need to add the building into the GPNA tool. To do this, navigate to and select “Edit Development Buildings” under the Development/AMPs column on the Control Panel. Select “add building” at the bottom of the page. A new line will open on the list of buildings named “new building.” You should rename the building to be more descriptive for you. You then select the non-dwelling type from the dropdown menu under “type” from among the choices of Maintenance, Office, Storage, Community Center, and Other.

Once the building is added to the GPNA tool, the user navigates to Control Panel “add building set” and selects “Non-dwelling structure” from the structure type dropdown menu, then enters a building name. Navigate to the Control Panel, select the newly added building on the building sets list, go to “edit building set,” and assign a building(s) to the named set. An inspection form can then be created for it.

Adding a non-dwelling building will not affect validation with PIC at submittal and adding this building in the tool will not revise PIC.

10. How do I address “down” units that are currently undergoing renovation (e.g., an office conversion or ADA unit conversions in progress)?

The GPNA does not consider the occupancy status of units, only physical needs. The goal of the GPNA is to project needs going forward. If you have a number of units that are currently in renovation, you would want to reflect in the GPNA their completed condition, and all these units should be in their own distinct set, or sets, since their characteristics are now different from other non-renovated units that might be the same size or in the same building. The GPNA should not reflect the cost of the current renovation.
You will also need to ensure that the inventory data in the GPNA tool matches current PIC data when you submit the GPNA to HUD.

11. When I try to “Add Site” I only see numbers or letters and no site names.

The PIC data that is loaded into the tool is to the level of AMP. Some PHAs maintain two or more separate developments within an AMP. The “Add Site” function is where this separation into developments is begun. For each separate development within an AMP, identify it by name and whatever other identifying information is useful to you (address, etc.). You may also enter basic aggregate site quantity data here for your own use (these entries are not required to use the tool). Once you have named your sites, these names will appear in the Site Sets column and you may open a separate site inspection form for each of the sites.

12. If I have multiple properties in an AMP and am Editing Projections on a Line Item and I have several “Line Items With Matching IDs,” can I tell which property I am Editing?

No. This is not possible with the current software.

13. Are there any published standards for “Refurbishing Costs”?

Refurbishing costs can be found in, for example. *Means Mechanical* and other publications for some but not all items. A PHA may use the publication it considers appropriate to best suit its needs. In order to use a refurbishment rather than a replacement, it must extend the useful life by at least half of the useful life of a replacement.

14. When would I change the local multiplier for a single cost item? Can I set a global multiplier and lock it?

For single cost item:

The local multiplier for a single cost item should be changed when local experience dictates a difference in price that establishes the need for such change. For example, if the cost index you are using says the geographic multiplier for your area is 0.83 and you have entered that as a global multiplier (see below), you would change that multiplier cell for that single line to 1 if you were instead reflecting an actual local cost you paid for an item. See the GPNA User Guide for more information.

For global multiplier:

Yes. This is an option in the tool if you are using national standardized cost estimates. You can set a global multiplier and lock it and change it in the cost library detail screen. Simply go to the Cost Library and under the “Perform Action Drop” dropdown list there is a “Set Local Multiplier.” Choose that multiplier and make the needed change.
15. If I have multiple Sites in one AMP, can I manage them separately in the GPNA?

Yes, using the “New PNA” function of the tool or other copies of the tool, the user can track and create reports on Sites that are a subset of a large AMP. The user can use different costing information, treat the needs of each property differently, and run other tests and scenarios. This is an optimal use of the tool to assist the PHA in its own planning. In reporting to HUD, the PHA does need to be vigilant about using a reporting version that preserves the AMP structure as recorded in PIC and including all of the buildings and units within that AMP level report to HUD. Additional guidance related to this feature can be found in the July 2013 revised User Guide, available by request to HUDPNA@hud.gov.

16. On a network, can two or more people work on the same GPNA database at the same time?

This functionality is only available with the Client Server version of the GPNA Tool. When a user has obtained and installed a server version and linked client versions to the server version on its shared network drive, several users can work in the same tool simultaneously. Entries by each “client” will be reflected in the linked server version as well as in all other client versions linked to that server version. This application is most useful for a well-established team of users with well-understood input protocols that minimize the possibility of entries being inadvertently modified or deleted.

17. How and when do I back up and protect my GPNA data?

A PHA should always observe best practices in preserving agency data and backup data frequently, both onsite and offsite. Depending on the size of the PHA and the sophistication of its hardware systems, data on the server may be backed up daily on the same drive, or to a “cloud.” Given the potential for failure of hard drives, use of the "cloud" backup systems should be given serious consideration. For data on the server, the technician supporting the systems may be charged with backing up periodically offsite, or onto media storage placed in a fireproof safe onsite, or both. Of more concern are instances where the data are stored on individual staff laptops or desk computers that are not linked to a server. PHAs may wish to consider developing a protocol in those instances where a backup is made daily (e.g., onto a thumb drive) during the timeframe the GPNA's are being prepared, and then any time updates are made. Good practices include having more than one external storage device and rotating them and/or use of a “cloud” backup system.

The default location name of the file that contains all of the live GPNA data that need to be backed-up and protected is C:\Green PNA\GreenPNAFull.accdr. This may differ in the case of vendors who follow the procedure to have multiple live GPNA’s on one computer.

**Assessment – Conducting the GPNA**

1. The tool lists many specific components; must all of these components be inspected during the course of completing a PNA?

A PHA must only inspect those components that it has in its relevant inventory.
2. For the inspection and data collection, do I need measurements or unit counts for each item?

Yes for all applicable items (not all component items in the cost library will apply to a unit). All component items will require a quantity in order to calculate a total cost. A quantity will require a unit of measure, such as sq. ft. or linear feet, for example. The user may select the unit of measure for each line item (see “edit” on each line in the master cost library). The user does have the flexibility to express quantity by lot if that accurately reflects your circumstance and can result in a reasonably reliable cost. HUD does not mandate the units of measure.

3. If I do not know when components and/or appliances were installed, how do I determine what to enter for the Remaining Useful Life?

The “Remaining Useful Life” (RUL) is not simply the Effective Useful Life (EUL) minus the age of the component. Some equipment may have received regular preventive maintenance and been well treated, so that the remaining useful life, when added to its “age,” would exceed the estimated “Effective Useful Life.” It is the experience and judgment of the inspector based on a visual inspection of the current condition of the component that come to bear to provide an estimate of each item’s “Remaining Useful Life.” The RUL is entered on the inspection form for each item and is one of the key entries required to produce the cost projection. The year of installation column is provided but is not a necessary entry. The tool will always default to the RUL entry.

4. What do you mean by “Effective Useful Life (EUL)” and how is it reflected in the GPNA software?

The Expected Useful Life or EUL for a GPNA component is generally the number of years that a building system or component is expected to be functional (is useful) from the time it is new until it wears out, is no longer functional, and needs to be replaced. The EUL is one of the key entries required in the GPNA Tool to produce the cost projection. The EUL is entered on the cost library for each component. See the GPNA User Guide’s Cost Library discussion for additional information.

5. Are there any published standards for “Refurbishing EUL”? 

No. There are no published standards for refurbishing EUL. The degree and type of refurbishments can vary widely depending upon the component. There is no requirement to use the refurbishment function or to enter pricing for it if you are not going to be considering a refurbishment. The optimal use for this function is if you have a component that you are going to refurbish next year for a cost x that will then need to be replaced later in the 20-year cycle of the assessment with a new item at cost y.

6. Are there any published standards for “Replacement EUL”? 

Yes. See, for example, Expected Useful Life Tables, Attachment D in USDA Rural Development’s unnumbered letter dated January 7, 2011. Some states also publish Expected Useful Life Tables for their various agencies. R.S. Means publishes a schedule of estimated useful lives in its Preventative Maintenance volume.
7. Can the GPNA be completed on paper or a spreadsheet and then integrated into the GPNA software for uploading to HUD?

Yes. PHAs may print blank copies of inspection forms, cost libraries, and even the cost projection. Paper data must be manually entered into the GPNA Tool. Alternately these same documents can be exported from the tool into Excel spreadsheets. Entries can be made onto the Excel spreadsheets and then the spreadsheet with the new entries can be imported back into the GPNA Tool. Note that an imported Excel spreadsheet must be the same spreadsheet as was exported-you cannot import an Excel spreadsheet that originated from a different tool or for a different field within the same tool. You can cut and paste data from another Excel spreadsheet into the spreadsheet you intend to import.

8. Can anyone gather information and input some of the data on the GPNA form, or does all input have to be conducted by a person/company that is “qualified”?

The qualifications for performing a PNA or energy audit can certainly be met by a team of professionals, not every one of which need have all of the qualifications but which as a team covers all of the skill sets required. It makes a lot of sense to divide up responsibilities. The intent of the rule in requiring qualifications is that the result is deemed reliable.

9. If I am in Edit Projections on a Line Item in the Cost Projection, spread the work over several years, then mistakenly click “Project Cost Over 20 Years” or “Reset Projection” buttons, and lose all my work, is there a “Go Back” button or do I have to start over?

There is no “undo” or “Go Back” function in the GPNA Tool. In this example, you will have to re-enter the spread for this line item. “Project cost over 20 years” automatically calculates and enters into the 20 year schedule according to the entries the user had made above that box. “Reset Projections” pulls data from the inspection forms.

10. Does the GPNA tool allow different costs for the same component at different building types?

Yes. The costs can be modified per AMP and per building type. The user can enter one cost for a component in the Master Cost Library and “update” all the AMPs with that cost, then manually modify the cost for that single line item within a single AMP’s cost library.

11. Are items, such as water heaters, stoves, etc., which may not be captured in a current PNA required to be in the GPNA (items replaced from non-routine maintenance on an as-needed basis)?

The PNA Final Rule will require a “comprehensive PNA” that shall capture “all capital costs needed to comply with public housing requirements.” The PHA determines which components are reasonable to include for its long-term planning with the threshold being components that are planned to be replaced using Capital Funds.
If you plan to use Capital Funds for items replaced from non-routine maintenance on an as-needed basis, then these items should be included in the GPNA. If these replacements are considered operating expenses, then they are not required for the GPNA. (HUD recommends that the PHA consider including these costs anyway for internal planning purposes.)

12. Should the PNA include operating expenses related to maintaining units? For example, if a PHA typically replaces carpet or repaints at unit turnover as an operating expense, should it be included in the PNA?

This is at the discretion of the PHA. The PNA Final Rule will require a “comprehensive PNA” that shall capture “all capital costs needed to comply with public housing requirements.” The PHA determines which components are reasonable to include for its long-term planning, with the threshold being components that are planned to be replaced using Capital Funds. Beyond that, some PHAs, for their own planning, may elect to track components, such as carpets replaced at unit turnover, at a more granular level.

There is not a requirement in the rule that operating expenses be reflected in the PNA. The annual update function of the GPNA Tool does allow you to enter operating costs as a source of funds used to complete any of the work if you choose to do so.

13. Is there a publication that lists the utility “Usage per Year” for various standard and sustainable equipment and systems?

This requires looking up the specifications or manufacturer information for each individual item. This is data that is required to be included in an energy audit. HUD is unaware of any publication or document that aggregates utility usage for a large number and range of sustainable systems and equipment.

14. Is a “Sustainable” item to be listed both under “Replacement” and “Sustainable,” for example, or does it go into only one or the other?

Any new sustainability item goes into the cost projection in the “Add Sustainability Item” in the Control Panel. If there is already an existing sustainability item in place on the property that is being replaced, this is recorded in “Replacement.” However, from a reporting standpoint, anything set up to be a Sustainable Need (or Accessibility Need, etc.), will show up only in that summary category, along with being in the Total Needs. Total Needs is comprised of a total of Replacement, Accessible, Sustainable, Refurbishment, and Marketability Needs.

15. What is “Immediate Replacement %” on the Add Sustainability, Marketability, or Accessibility screens?

This cell is used to override Remaining Useful Life (RUL) when entered for that percentage. For example, if there are 100 hot water heaters and 10 are replaced with high efficiency units, then 10 percent are new. This 10 percent figure should go into the cell immediately under the projection schedule and the other 90 will have a different RUL.
16. When inspecting an item or “Add Replacement Item,” what is the difference between “Immediate Replace%” and “Immediate Refurb%”?

The GPNA allows the user to account for refurbishment activities reflecting the reality of most public housing authorities. Using the refurbishment tracking functionality of the GPNA can contribute to a more accurate assessment if a user chooses to use it but can increase complexity. Note that the tool only permits refurbishment to be planned for the first 5 years so that the subsequent replacements more than 5 years later would be calculated by the tool at the replacement cost level. In the case of a component that may at the time of inspection indicate that it has reached the end of its useful life, sometimes a judgment can be made that a portion of the component could be refurbished at lower cost instead of replaced. An example might be a chain link fence with portions that have posts and cross members remaining firmly stable and other portions where posts and cross members are unstable, bent, or otherwise in need of total replacement. In this case the tool allows the user to set the proportions of replacement and refurbishment. This will create a separate line in the cost projection for the refurbishment estimate.

17. Suppose we want to remove an item rather than refurbish the item, do we simply omit the item from the PNA?

The PNA should reflect exactly what the PHA is doing. If the PHA no longer wishes to include an item that is no longer needed, required, or serviceable and does not want to replace the component, the appropriate action in the GPNA is to remove it or simply not assess it as a component. That action would remove it as a capital need—either an immediate need or in any one of the 20 years covered by the GPNA.

18. When the cost index we are using has multiple line costing for one GPNA ID, such as for chain link fence, how do I record Unit costs for: demo fence, install fence?

Take a composite average of the cost for demo fence and the cost for install fence. Please refer to the GPNA Final Draft User Guide dated July 2, 2012: “Cost Index Reference: The reference ID used in the Cost Index for the item,” when it requires multiple reference ID’s to establish a “total cost” for an Item, a description should be noted in the Cost Index Reference or in the Notes boxes. If the multiple line items are for substantially different subsets of the item, such as 4-inch chain link fence vs. 8-inch chain link fence, an additional line can be entered into the Master Cost Library to reflect the differing items. Each can then be used separately as needed.

19. What does the GPNA mean when it says it may include “marketability” items?

These items can be added in to the cost projections. The GPNA process initially looks at the AMP as the building(s) currently exist(s). In some instances there may be physical improvements not currently in place that the PHA would like to add to increase the market value or rental potential of the project. For example, many public housing AMPs were developed with efficiency units that may be difficult to market successfully today. The PHA may decide to combine two efficiencies into a single one-bedroom apartment unit. The cost of converting the efficiency units into a one-bedroom apartment is considered a marketability item. Other
examples might be adding exterior lighting or unit air conditioning to a project where these components do not now exist.

20. How much can I change the Line Item ID number?

Existing Line Item ID numbers can be changed and new Line Item ID numbers can be added. On the Master Cost Library, any component line can be edited by selecting the edit box at the end of the line. Line items can be added by selecting “add line item” from the dropdown at the Perform Action window on the bottom of the page. When changing or adding line items, the user should maintain the numbering convention so that the costs of added components are aggregated within their appropriate category—site, building exterior, building interior, units, etc.

21. If there are component costs that cannot be found in the cost index we are using, can I use “HA Estimate” for these if I have a supportable cost and can I use “HA Estimate” for all unit costs?

The key to a successful Physical Needs Assessment is to use realistic costs for the components to be replaced. Using recognized cost indices can produce a broadly reliable estimate for most common property components. Some properties may have unique components and some PHAs may keep good records of actual cost on a variety of their own common components. Generally speaking, supportable local cost based upon actual experience would result in more reliable estimates. The GPNA user can always substitute an index-supplied estimate with an estimate based upon local cost, although when doing so, the user needs to be careful to eliminate the geographic multiplier on the applicable cost library for estimates based on local actual cost.

22. Assemblies vs. Components: The GPNA tool comes pre-populated with many individual components. Is it acceptable to report the needs of a bathroom as one assembly, i.e., reporting need and cost of the whole bathroom rather than each individual component?

Best practice would be to consider components rather than assemblies; the GPNA Tool uses the information from each component to make its calculations. Individual components have different projected and actual life expectancies and related costs that would not be captured using an assembly model. As with the composition of sets, the results will only be as useful to the PHA as the accuracy of the life expectancy of the components.

23. What if I have many types of chain link fences on my various sites?

Take the average of the different types of chain link fence, and record it as your response, based on the average type fence. The GPNA allows for the adding of line items within the same component. If a PHA has several types of chain link fences, it could either use a middle value (average), or it could add additional line items under the same component (Fencing and Gates), with distinct line items. For example, Line item 1010 is Chain Link. One could add Line item 1013, Fencing and Gates, Gold-Plated Chain Link Fence. This can be done in either the Master Cost Library, or in the AMP/Development Cost Library, or both.
24. Can I use a separate “Cost Library” for two very different sites?

Yes, you can use different cost libraries for each AMP that is inspected. However, it is important to keep in mind that there is a Master Cost Library, and that its content can be replicated into the Cost Library for each individual AMP. Given that, a good sequence in setting up the GPNA software would be to follow these steps:

- Complete the Master Cost Library for the full GPNA;
- Update developments/AMPS from the Master Cost Library; and then
- Customize the Cost Library for any items you wish to modify in each AMP.

Be careful not to go back and modify the Master Cost Library and update the Developments/AMPs again, as it will overwrite the customized Cost Libraries for each AMP. See the GPNA Final Draft User Guide dated July 2, 2012.

25. How do I record a new handicap ramp as opposed to the renovation of an existing handicap ramp?

For the new handicap ramp, this issue relates to how Sustainability, Marketability and Accessibility items are to be added. For a new item, in “AMP Cost Projection,” from the “Add Line Items” dropdown list, choose “Accessibility” and then click “Add” and put in the information. This information will also show up in the Cost Library. Regarding the replacement or repair of an existing item such as a handicap ramp, once this is entered as an Accessibility item as discussed above, it will appear in the Cost Library, so replacement or repair costs could then be entered for a repair to an existing ramp. See page 75 and 116–118 of the GPNA User Guide.

26. My PHA is planning to take down units to convert them to accessible units. How should I record the cost of the conversion?

This depends on when the conversion will occur. The GPNA is forward-looking, so if the conversion is imminent or in process then the unit needs as recorded should reflect the conversion as completed in the GPNA (the conversion will never happen again to those same units). What you would want to be showing for those units is their needs going forward after the conversion. You will also need to ensure that the inventory data in the GPNA tool match current PIC data when you submit the GPNA to HUD.

If the conversion is planned for the future, then you should enter the cost in the accessibility schedule.
27. I have entered most of the information from the inspections, yet nothing appears on the 20-year table. What am I missing?

In order for an item to display in the 20-year Cost Projection, there are a minimum of four fields that must be entered for each applicable component:

- In the cost library for the applicable AMP, the cost of the item.
- In the cost library for the applicable AMP, the estimated useful life (EUL) of the item (note that once the Master cost library is populated, you need to migrate the information to the AMPs—see the pull-down on the Master Cost Library that accomplishes that with a single entry). This is the entry most frequently omitted.
- On the inspection form, the quantity of the item.
- On the inspection form, the remaining useful life (RUL) of the item.

When the above four fields are entered, on the Cost Projection page you select “Run Inspection Projections” at the top of the page, which pulls in the inspection information and performs the calculations with the cost library to arrive at the 20-year results. Before displaying the 20-year projection, the tool will display a printable report that records missing fields that prevented calculation of a projection for specific lines.

28. My PHA contracted out the GPNA to a third-party vendor. The vendor keeps asking me to go to their office to review, update, and input information in the GPNA Tool. Is there a way for me to do this without going to their office to work on their copy of the tool?

Yes. While the GPNA Tool file is typically too large to email back and forth (and doing so could lead to unintended changes or mistakes due to user error), the vendor can export Excel spreadsheets and reports from the tool. All the key pages are exportable (cost libraries, inspection forms, and cost projections). You can make entries or changes to these, and the vendor can enter those changes into their copy of the tool. You may also want to look at file sharing sites, like Google Docs, SharePoint, Drop Box, Box.Net, etc., that the PHA and your contractor can use to accomplish this purpose.

29. There are a great many potential line items in a GPNA. Once the initial set up has been completed and the first GPNA completed, can the user “turn off” the line items that are not used?

No, unused line items will remain in the GPNA Tool in the cost libraries and on the inspection forms. The Cost Projection, which is the main product of the GPNA, only displays those items that were present on the inspection form or added by the user.

30. How do I insert “green” alternatives that are additions to the property and that do not necessarily correspond to a replacement?

When reflecting a sustainability need that does not have a corresponding existing component, you should create a tracking component line item to compare to and assign that new line a
nominal value (say $.01 per square foot). Then, when you create the sustainability item for the specific green alternative, you can correlate it with the tracking line you created and reduce the cost in the sustainability line by the nominal amount you assigned it. That way the total cost will be reflected correctly on the bottom line of the cost projection. When you add the tracking item to the master cost library and each AMP’s cost library, that item will add itself to the inspection form. Once you enter a RUL and quantity on the inspection form and “run inspection projections” on the cost projection, the tracking line will show up there. When entering on the sustainability entry, you will back into the savings by assigning a usage to the tracking item that essentially matches your savings identified from an energy audit. You should make notations at the entry pages about your methodology.

31. Can inspection forms be loaded to hand-held equipment for conducting the field assessment?

Any hand held tablet or device that will accept a Microsoft Excel spreadsheet can be used to make inspection entries that can subsequently be imported on the Excel spreadsheet back into the tool.

32. What do I do if my PIC data change while I am completing the GPNA?

Once a PIC data set has been imported into a tool, it is not possible to import another PIC data set into the same tool even for the same PHA to update it. The PIC data in the GPNA submission must be consistent with the PIC data that HUD has on record. Note that this applies only to inventory data and does not include tenant/occupancy data. PHAs are encouraged to verify the PIC data before beginning the GPNA. If errors are discovered, the PHA should request a modification to PIC and await completion of the update before beginning the GPNA. PHAs are also encouraged to postpone requesting additional modifications until after the GPNA has been successfully submitted to HUD. If changes to PIC do occur during the course of completing the GPNA, a PHA may export the data in the current GPNA and import them into a new GPNA tool that contains the corrected PIC data. A PHA may also make changes to the PIC data within the GPNA tool, although PHAs are cautioned to ensure that any changes made to PIC within the GPNA tool are precisely the same as the changes made in PIC through a request to HUD.

33. How and when do I back up and protect my GPNA data?

A PHA should always observe best practices in preserving agency data and backup data frequently, both onsite and offsite. Depending on the size of the PHA and the sophistication of its hardware systems, data on the server may be backed up daily on the same drive, or to a “cloud.” Given the potential for failure of hard drives, use of the “cloud” backup systems should be given serious consideration. For data on the server, the technician supporting the systems may be charged with backing up periodically offsite, or onto media storage placed in a fireproof safe onsite, or both. Of more concern are instances where the data are stored on individual staff laptops or desk computers that are not linked to a server. PHAs may wish to consider developing a protocol in those instances where a backup is made daily (e.g., onto a thumb drive) during the timeframe the GPNA are being prepared, and then any time updates are made. Good practices include having more than one external storage device and rotating them and/or use of a “cloud” backup system.
The default location name of the file that contains all of the live GPNA data that need to be backed-up and protected is C:\Green PNA\GreenPNAFull.accdr. This may differ in the case of vendors who follow the procedure to have multiple live GPNAs on one computer.

**Energy Audit**

1. I am a Section 8 only PHA. I have no public housing units. Is this energy audit rule applicable to me?

No. The rules that are proposed for GPNAs and energy audits at 24 CFR 905.300 are only applicable to public housing. Other rulemaking administered by other HUD offices may impose requirements that an energy audit be performed on Section 8 inventory.

2. I am a small PHA; do I have to do an energy audit? If so, are there streamlined or special accommodations for small PHAs?

As is the case with the existing energy audit rule, all PHAs regardless of size are required to perform an energy audit every 5 years. This new energy audit rule does not change that requirement and there is no differentiation in the standards for an energy audit based upon PHA size.

3. Do I have to include all of my public housing projects or can I do one energy audit for the entire PHA?

The energy audit must be integrated with the GPNA that is recorded within the GPNA and reported from it at the project/AMP level. The energy audit results need to be able to be segregated at least at the project/AMP level to achieve the required integration with the GPNA.

4. What format or software do I have to use to complete the new energy audit?

HUD will not be providing or mandating a format or software for the energy audit. The energy audit need only follow the requirements of the final rule and provide the minimum data required by the rule for input into the GPNA.

5. Why is the energy audit being “integrated” with the GPNA, since they have always been done separately?

The Congress required “integrated utility management and capital planning to maximize energy conservation and efficiency measures” in the 2005 Energy Policy Act. HUD has long recognized the significant relationship between these aspects of real estate management and the broader property assessment industry has moved aggressively to integrate energy conservation and capital planning. There is a direct link between the physical condition of a public housing project and the cost of operations of the same project. By analyzing energy conservation measures at the time of the GPNA, most of which relate to the very same components that are being assessed in the GPNA, PHAs can identify ways to reduce the overall operating cost of the project and make the project operate more effectively and efficiently for many years into the future.
6. If a PHA has performed an investment grade energy audit for an EPC, does that satisfy this energy audit requirement? What if a PHA has already implemented an EPC?

The energy audit needs to comply with the provisions of the final rule and an investment grade energy audit may not necessarily do so. An EPC may not include an audit of the entire inventory and may exclude some energy conservation measures (ECMs) that are not in the specialty areas of the Energy Service Company (ESCO) or ECMs that do not conform to the financial model of the specific EPC structure. If a PHA is contemplating an EPC, it should coordinate the requirements of this energy audit with the energy audit that may be performed to support an EPC. This can be done through adding a requirement to do so into the EPC solicitation. Regardless of whether an EPC has been implemented, a PHA will need to perform an energy audit every 5 years. The nature and costs of ECMs are dynamic and ECMs that may not have made financial sense in the structure of a previous EPC may very well be feasible 5 years later.

7. What if the existing energy audit does not have energy usage, utility rates, or replacement unit costs for energy conservation measures and the comparable standard components?

These are required elements of the GPNA energy audit. The PHA should consider conducting a new energy audit to capture these required elements. If the existing energy audit was completed within 3 years of the PHA’s GPNA submission due date, the PHA could supplement its existing energy audit to provide this information in order to complete the GPNA.

8. Can my staff perform the energy audit or do I have to hire a contractor?

Qualified staff may perform the energy audit, or a PHA may choose to hire a contractor. The qualifications for anyone performing an energy audit are the same and are stated in the proposed energy audit rule.

9. What are the qualifications of the person performing the energy audit?

The proposed public housing Energy Audit Rule published on November 17, 2011, provides a two-tiered set of qualifications. First, the energy auditor is required to be experienced in the performance of residential building energy audits. Second, the energy auditor must hold a current, valid certification from a state energy audit certifying agency for the state where the property is located or a nationally recognized energy audit certification provider, or hold a certification acceptable to HUD or expressed in HUD guidance.

With regard to the certification portion of the qualification, certifying organizations such as (1) the Association of Energy Engineers (AEE), (2) the Building Performance Institute (BPI), and (3) the Residential Energy Services Network (RESNET) are examples of reputable national certifying agencies for energy audit professionals, and all represent organizations that are acceptable to HUD. Note that a RESNET Home Energy Survey Professional (HESP) may or may not be qualified depending on the types of buildings in the development; RESNET has traditionally focused on self-contained residential unit types such as single family, duplex, and townhouses. A RESNET HESP-certified individual may not have adequate training to audit multi-family housing buildings such as an elevator building or ones with significant energy...
10. Is HUD offering a certification course for energy audits?

No. PHAs may contract with any qualified vendor to perform the energy audit with its qualified staff. Qualifications for performing an energy audit will be included in the final rule. A reputable certification from a state or national certifying agency is a required qualification for the performance of an energy audit. The American Association of Energy Engineers (AEE), the Building Performance Institute (BPI), and the Residential Energy Services Network (RESNET) are examples of reputable and appropriate national certifying agencies for energy audit professionals.

11. What should a PHA include in a solicitation for an energy audit contractor?

A PHA should reference the energy audit rule and require evidence of qualifications from vendors. The energy audit rule does not necessarily require all of the investigations and services that a PHA might want. Of course the size and nature of the inventory is relevant to a proposal. If the PHA has particular insights or preferences, these should be stated. The rule suggests a number of different options for inclusion in the energy audit for which the PHA should provide clarity. Will the energy audit explore advanced ECMs such as geothermal, wind, solar, or cogeneration? Will the energy audit include assessment of green measures such as indoor air quality? The PHA needs to consider the form of reporting it wants such as written reports suitable for public dissemination, or in person briefings at meetings. Although not required by the rule, the PHA may want to consider an investment grade energy audit that meets the requirements of the energy audit rule.

12. When will I have to complete the energy audit?

Results from a recent energy audit must be incorporated into the GPNA. Many PHAs will need to perform an energy audit either ahead of completing the GPNA or at the same time as the GPNA. If the PHA has an energy audit that is relatively recent, that energy audit may be used if it conforms to the requirements of the new rule and includes the energy audit information required in the GPNA Tool. Specifically, the Final Rule requires that the energy audit have occurred within 3 years of the date that the GPNA submission is due to HUD (the due date according to the PHA’s fiscal year end, not the date that the PHA submits the GPNA).

13. What should I do if my energy audit is due before the new rule becomes final?

If your energy audit under the current rule is due and the new rule has not been issued, you are encouraged to consider proceeding with an energy audit using the new standards in the proposed rule. While there is the possibility that terms of the final rule could change requiring you to supplement the audit, it is also possible that waiting until the final rule is in place could expose you to delay as many more PHAs may be procuring these services.
14. My PHA conducted an energy audit a few years ago. Can I use it for the GPNA?

It depends. First, the previous energy audit needs to comply with the provisions of the final rule. Second, the energy audit must have occurred within 3 years of the date that the GPNA submission is due to HUD (the due date according to the PHA’s fiscal year end, not the date that the PHA submits the GPNA). If the PHA’s energy audit meets these two conditions, then it can be used for the GPNA.

15. How often do I have to repeat the energy audit?

An energy audit must be completed every 5 years as is the case for the GPNA.

16. Will I have to do energy audit annual updates like the GPNA?

No, but the GPNA will list energy conservation items and as a result of updating the GPNA the PHA will report on those items that it may have completed in the year including energy conservation items.

17. I completed my last energy audit 4 years ago; when do I have to do the next energy audit?

In this circumstance the energy audit would not be recent enough to integrate with a currently performed GPNA. Therefore, a new energy audit would need to be performed to coordinate with the next GPNA you are required to prepare and submit. Subsequent energy audits would then be due at 5-year intervals coordinating with future GPNA completions.

18. I have a project that HUD approved for demolition; does it have to be included in the energy audit?

No, as long as a demolition or other disposition is approved by HUD, the project does not need to be included in the energy audit. If the units have actually been removed from inventory and no longer show in PIC as ACC units, the user can and should remove the units from the GPNA tool as per the instructions in the July 2013 revised User Guide. If the demolition/disposition is proposed but not approved, a GPNA must be completed. Project PNA data must be gathered and included in the GPNA until HUD has approved an application for demolition or disposition. The PHA is not required to perform a PNA on inventory approved for demolition or disposition, but if the units have not yet been actually removed, they are still reflected as ACC units and should be grouped together into an assigned set. A PHA may elect to record costs associated with removal such as demolition costs and potential replacement costs if there will be a long time interval between the time of approval and the actual removal of the units from inventory.

19. Should the energy audit be conducted per AMP, per building, or per unit?

The Proposed Rule (24 CFR Part 905 as published in the Federal Register Vol.76 No.222, November 17, 2011) states that the energy audit is required for “each PHA-owned project under management.” The energy audit must be done in such a way as to capture all the core ECMs. In an AMP with all like buildings, this may be possible at a Development/AMP level. AMPs with
multiple developments and/or building types will probably require a further breakdown to capture an accurate picture.

20. What cost-effective ECMs do I have to include in the energy audit? What am I required to install?

PHAs are not required to include any specific ECMs. The energy audit rule does require that every energy audit consider all “Core ECMs” that are defined as ECMs within broad categories of ECMs such as building envelope, appliances, heating and cooling, water conservation, power, and lighting.

The energy audit provides the PHA with the data that are used in conjunction with the GPNA. The rule requires that the energy audit findings shall be integrated into the GPNA, but any final decisions regarding the implementation of any physical improvements, including ECMs, continue to be the judgment of the PHA in the context of current rules.

21. Is water consumption and conservation included in the energy audit?

Yes. Energy auditors should check for water-saving devices, such as low flow aerators, shower heads, and toilets.

22. What payback period is used to determine a cost-effective energy conservation measure (ECM)?

The Proposed Rule categorizes payback periods into three segments:

- 5 years or less;
- Greater than 5 years and less than or equal to 10 years; and
- Greater than 10 years.

23. Should I include energy conservation incentives (e.g., rebates, tax credits and deductions) when calculating payback?

No. These types of incentives are often unpredictable and may include temporary, short-term funding streams that may become unavailable at any time. They also often predicate on certain conditions which may not be guaranteed. Therefore we do not recommend that these types of savings be included in your simple payback calculations. They are not provided for in the calculation of simple payback in the GPNA. As a best practice, this type of incentive should certainly be recorded in the comments section of the GPNA so that it would be considered when performing an in-depth evaluation of the investment.

24. What about “green” items that do not save energy?

The energy audit rule encourages but does not require PHAs to consider and include “green” items that do not save energy but may be good for the environment and health of the public housing residents. For example, measures that improve indoor air quality may not have a direct
financial benefit reflected in utility costs but have other quality of life benefits. PHAs that have a desire to improve indoor air quality, for example, may find it beneficial from a cost perspective to include that assessment with the energy audit.

25. Will I need copies of my utility bills, and if so, for how long?

Yes. A PHA must analyze fuel, electricity, and water bills and usage for at least a one-year period, with 3 years recommended, for at least the PHA-held accounts for trend analysis and industry benchmarking when available, and for tenant-held accounts where usage information is in the possession of the PHA. PHAs are encouraged to use existing tools such as the Energy Star Portfolio Manager: [http://www.energystar.gov/index.cfm?c=evaluate_performance.bus_portfoliomanager_benchmarking](http://www.energystar.gov/index.cfm?c=evaluate_performance.bus_portfoliomanager_benchmarking).

26. Will I need anything else to do the energy audit other than my bills?

The PHA will not need to provide anything else in addition to what it has already assembled for the PNA. Past energy audits are excellent resources. The person performing the energy audit will be required to review projected costs, cost savings, and payback periods for various energy conservation measures (ECMs).

27. In addition to specific ECMs, what does the energy audit have to include?

The Proposed Rule provides that the energy audit must, at minimum, address Core ECMs and:

- A summary of the findings
- Assessment of energy-related physical components within Core ECMs
- Assessment of operations and maintenance and resident education related to energy conservation and green
- Analysis of fuel, electrical, and water bills and usage for PHA held accounts
- Categorization of ECMs into payback periods of:
  - 5 years or less
  - 5 to 10 years
  - Greater than 10 years
- Projected cost of ECMs and incremental cost of ECMs
- Projected annual savings in water consumption
- Projected annual energy savings in both consumption and dollars for recommended ECMs
- Expected Useful Life for recommended ECMs and green measures
- Life cycle costs or savings of ECMs including disposal, maintenance, etc.
- Identification of elements, not quantification
• Energy Audit must also address:
  o Related physical improvements
  o Reliable data from previous audits that may carry over
  o Differentiate ECMs between those considered routine operating and maintenance, and those that are capital in nature.

The final rule, which has not been published yet, will specify the items that the energy audit must include. When the final rule is published, these FAQs will be updated to provide that information.

28. Is the energy audit an eligible expense under the Capital Fund?

Yes.

29. Is the energy audit an eligible expense under the Operating Fund?

Yes.

30. Am I required to include each and every ECM identified by an energy audit and GPNA in my Capital Fund 5-year and annual plans?

No. The energy audit and associated GPNA are planning tools to help PHAs prioritize needs for inclusion in commitment documents such as their 5-year and annual plans. PHAs include in their commitment documents only those ECMs that the PHA judges are appropriate and for which it has sufficient funds.

31. What training will HUD provide on the new energy audit?

Training on the energy audit requirements will be integrated in training on the new GPNA, which incorporates the energy audit. However, HUD has no plans at the present time to provide training separately on performing energy audits. The requirements of the HUD energy audit are not unique and should be well understood by providers meeting the qualification and certification requirements of the rule.

32. Do I have to submit the energy audit to HUD like the GPNA?

No. The PHA uses the energy audit information in conjunction with the GPNA and to complete certain entry fields within the GPNA Tool, so in that context some of the information is submitted. There is no specific requirement to submit the energy audit in its entirety although it must always be available for review if requested such as by field office or other HUD staff performing their duties.
33. Does HUD review and approve the energy audit?

The HUD Field Office verifies compliance and all energy audits are subject to review by HUD, but HUD review or approval is not required to complete the energy audit process.

34. If I have a question about the energy audit, whom do I contact?

The PHA’s local HUD Field Office.

35. Where can I go to find out more information on the energy audit and related requirements?


**Submitting the GPNA Data to HUD**

1. How do I submit my data?

Once the GPNA is complete and covers all developments/AMPs, to submit this data to HUD, go to the PNA Reports panel, and use the “Export All Aggregates to XML” option. This creates a separate file for each Development/AMP. You will then need to attach these files to an email to submit to PNADATA@HUD.GOV. You may make partial submittals by AMP in advance of the due date in the same manner but not including the individual files for the AMPs that may not be complete. In 2014, functionality will be added to the EPIC system to collect GPNA data submittals.

2. Who should submit the data? Does the Executive Director have to sign or certify the GPNA?

The PHA must submit the data to HUD, even if the PHA contracts out the GPNA to a third-party provider. As a general matter of management and oversight, the Executive Director should review the results of the GPNA to assure that it accurately reflects the PHAs needs and in accordance with the Rule. However, the Executive Director does not need to sign or certify the GPNA.

3. When I submit the data to HUD, will I get a receipt to confirm it was received?

The email mailbox will create an automatic reply to confirm that your email submittal was received at the correct mailbox. This does not constitute review or approval of your submittal that could take some time to complete. Generally the first review will be a validation that the
submittal matches the expected quantity of dwelling buildings and ACC units from PIC. Subsequently, each submittal will be reviewed for quality control of questionable or anomalous results.

4. My PHA contracted out the GPNA to a third-party vendor. They sent me the data to submit to HUD in an XML file. Do I need anything else from the vendor?

The GPNA Tool is a valuable tool for PHA planning purposes. The vendor should provide you with a copy of the tool containing the completed GPNA. You will need this for various reasons, including:

- You must make the GPNA summary information available to residents and the Resident Advisory Board (RAB) at the time it is submitted to HUD.
- You should use the GPNA information and results for developing the PHA Annual and Five-Year Plans and other planning purposes.
- You will need the GPNA Tool to complete the Annual Updates.
- You will need the completed GPNA to address any errors or inconsistencies in the data submission.

The completed GPNA Tool is too large to email, so the vendor should send you a copy on a CD, DVD, or USB drive. HUD suggests that any contract with a third-party GPNA vendor include requirements that the vendor provide a “walk-through” of the completed tool and that the vendor prepare a narrative summary of the results (the narrative summary is not required by the rule, but it is useful for sharing the results with the PHA’s Board of Directors, residents, and other stakeholders). The PHA may also want to include a requirement that the vendor meet with senior PHA staff and the Board to discuss the results of the GPNA.

HUD only receives summary cost data and does not have all the information to restore the data in your tool. If your GPNA Tool vendor were to go out of business or lose your data for whatever reason, you would have to start the GPNA process from scratch. You should have the completed tool for the protection of the data.

5. Will HUD review and approve the submission?

Your submittal will first be validated against your PIC data to ensure that your GPNA accounts for all of the buildings and units within the applicable Development/AMP. It is important that the GPNA submittal and current PIC data match, otherwise your submission will be rejected and you will have to revise the GPNA or, in the worst case, reenter data in a new GPNA tool loaded with corrected PIC data. Once validated, the submittal will be reviewed against broad benchmark measures to determine any anomalous results that would raise questions as to the accuracy of the submittal. The PHA will be contacted by the HUD Field Office in the event of such inquiries and will be required to satisfy the inquiry by explaining an anomaly or correcting an error causing the anomalous result. The GPNA as submitted is the PHA’s judgment of its long-term capital needs. HUD’s interest is that the PHA completes a GPNA as a strategic planning activity and that the GPNA data accurately reflects the PHA’s actual physical condition. HUD will aggregate the
submittals of all PHAs to develop benchmarks and to ascertain the condition and needs of public housing generally. When HUD is satisfied that the submittal is acceptable to add to the national aggregate, it will so advise the PHA. Such acceptance will be based upon the general appearance of quality and accuracy and does not constitute approval or disapproval.

**Annual Update**

1. **How much and what information do I have to include in the annual update?**

   The annual update is a report to HUD on the components of the GPNA that were completed in the current year. The PHA will enter the quantity of such component items completed during the year into the GPNA and the associated cost. The PHA will also report the amount and general source of funds used to complete the aggregate work that year that must at least equal the amount spent on completed improvements reported. The GPNA will provide a report to be used by the PHA to send to HUD.

2. **When is the annual update due?**

   The annual update is due 120 days before the end of the PHA fiscal year.

3. **When a PHA receives approval for demolition or disposition (other than for purposes of mixed-finance redevelopment), does the PHA update the data at that time? Or can the PHA wait until the next 5-year GPNA is due for that site? Or at the annual update?**

   No action is required between annual updates and no annual update is required for a project that is approved for demolition or disposition during the year. If only part of the project was approved for demolition or disposition, the PHA would proceed with the annual update. At the time of the next 5-year performance of the GPNA the inventory for the new GPNA will match the new inventory configuration and will adjust for the removal as appropriate.

4. **How do I submit the annual update?**

   On the Annual Update page there is a dropdown menu at the bottom of the page to export aggregates to XML that create a file similar to the one created for the original GPNA submittal. This file is attached to an email sent to the same submittal address (PNADATA@HUD.GOV). In 2014, this process is planned to be replaced by an upload of the data file by the PHA to EPIC.

5. **What happens if your PIC data changes between the original GPNA submission and an Annual Update?**

   Unlike the full GPNA, the Annual Update is not validated against PIC. The Annual Update reports on work that was done on the items reported in the full GPNA, but the reporting is not tied to a specific inventory configuration. We recognize that there will be PIC inventory changes during the interim periods between comprehensive new PNAs being performed every 5 years. We anticipate that the volume of such reconfigurations would be statistically insignificant for the kinds of uses HUD is making of the aggregate data. Some PHAs will face ambiguities due to
significant inventory configuration changes, and in those cases the PHA should work with the HUD Field Office to crosswalk data and report as much of the completed work as possible.

6. How should PHAs report AMP development regroupings and units that will come on line through development in the Annual Update?

We recognize that it is not possible for PHAs to suspend their inventory configurations indefinitely. Before the PNA is submitted, we are encouraging PHAs to stabilize their inventory before they request PIC data and until the time they submit the GPNA. Depending upon when their due date falls, they will find it advantageous to complete reconfigurations and have those reflected in PIC before requesting a PIC data set for their GPNA. Once a GPNA has been submitted, there is in no restriction on regroupings. We recognize that there will be PIC inventory changes during the interim periods between comprehensive new PNAs being performed every 5 years. We anticipate that the volume of such reconfigurations would be statistically insignificant for the kinds of uses HUD is making of the aggregate data.

7. Does the Annual Update require adding newly identified needs or changes to the quantity or priority of items identified in the full GPNA?

The Annual Update reports on work that was done on the items reported in the full GPNA. Work, i.e., expenses incurred, outside of the projected schedule are to be reported on the Annual Update. Quantities needed, newly identified needs, etc., will be updated when the full GPNA is done every 5 years. A PHA wanting to use the tool to continuously monitor and record such changes is encouraged to do so—in fact, it would be a good practice and make subsequent PNAs easier to perform. The PHA would need to maintain the integrity of the tool used to report from, thus such continuous updating would best be done on a duplicate copy rather than the reporting copy to minimize the potential for loss of the submittal data. If the PHA then wanted to submit a revised GPNA report on which it would subsequently report, it may do so, but it is not required. HUD wanted to make the annual reporting relatively simple for PHAs, knowing that every 5 years HUD would receive a full refresh of data.