



**Reporting Unit Months Available and Unit Months Leased
for the Public Housing and Housing Choice Voucher (HCV) Programs
ACCOUNTING BRIEF #17**

GOVERNING REGULATIONS AND GUIDANCE

1. 24 CFR Part 5 (Subpart H) –Uniform Financial Reporting Standards.
2. 24 CFR Parts 902 and 907 – Public Housing Assessment System (PHAS) and Determining and Remediating Substantial Default Interim Rule.
3. PIH Notice 2011-07 – Guidance on IMS/PIC Development Sub-Module Reporting and Validation.

BACKGROUND

The Uniform Financial Reporting Standards (24 CFR Part 5 – Subpart H) require public housing agencies (PHAs) to provide annual financial information to the U.S. Department of Housing and Urban Development (HUD) in an electronic format as prescribed by HUD. The electronic format is commonly referred to as the Financial Data Schedule (FDS). While the FDS is used to collect financial data, some data collected on the FDS is non-financial in nature but is needed by HUD to support PHAS and to better understand the financial position of the PHA.

Specifically, this accounting brief provides assistance on how to properly report unit months available (UMA - FDS line 11190) and unit months leased (UML - FDS line 11210) for the Public Housing and Housing Choice Voucher (HCV) programs. HUD has published the definitions for these two line items in the *Interim Financial Data Schedule Line Definition Guide* (November 2008). The following are the line definitions as shown in the *2008 Guide*. Both of these FDS line items are required fields.

- **11190 - Unit months available.** This FDS line represents the number of months available for all low rent, Section 8, and other subsidized units except those unit months vacant due to special use, modernization, litigation, disasters, casualty loss, changing market conditions, demolition / disposition and conversion.
- **11210 - Unit months leased.** This FDS line represents the total number of dwelling unit months leased by tenants during the reporting period. The reported amount should be based on the PHA's tenant rent rolls or housing assistance payment records.

This accounting brief provides further reporting information for these two FDS line items with respect to the Public Housing and HCV programs. The Department is in the process of updating the November 2008 *Interim Financial Data Schedule Line Definition Guide*. Once completed, a revised Financial Data Schedule Line Definition Guide will be posted to the FASS-PH website, which will reflect the following definitions for FDS lines 11190 and 11210.

Reporting Units for Public Housing Projects

11190 - Unit months available. For each Public Housing project, the PHA is to report the total number of months each ACC unit was under ACC in the PHA's fiscal year *reduced* by the number of months each ACC unit was in any of the following ten (10) IMS/PIC unit status categories/subcategories during the fiscal year:

- Vacant – Undergoing Modernization
- Vacant – Court Litigation
- Vacant – Natural Disaster
- Vacant – Casualty Loss
- Vacant – Market Conditions
- Non-Dwelling - Special Use: Anti-Drug/Crime
- Non-Dwelling - Special Use: Self Sufficiency Activities
- Non-Dwelling - Special Use: Other Resident Activities
- Non-Dwelling - Special Use: Other Moving to Work (applies only for an MTW PHA)
- Demolition/Disposition – approved (applies only to vacant units)

PHAs may reduce the unit months available (UMA) for these ten (10) IMS/PIC categories/subcategories only if HUD approved the vacancy or the special use. For unit months available associated with demolition/disposition approved units, PHAs may reduce the unit months available only when the units are vacant.

11210 - Unit months leased. This FDS line represents the total number of dwelling unit months under lease by tenants and other program participants during the reporting period.

For Public Housing projects the number of months reported must be on the same basis (i.e., the first day of the month or the last day of the month) that is used when reporting units leased on the *Form HUD-52723 – Calculation of Operating Subsidy*. Units leased include only those units categorized in PIC as occupied by:

- Low income families (assisted tenants),
- PHA employees,
- Police officers, and
- Non-assisted tenants over income.

Mixed Finance Projects. For those PHAs that have mixed financed projects, the PHA will report the number of ACC units (public housing units) designated in the mixed financed project in the respective project. Accordingly mixed finance ACC units that receive HUD funding (i.e., Operating Subsidy) will be reported in the project column of the FDS. If the mixed finance development is also reported on the FDS (e.g., as a component unit), the mixed finance development (component unit) would report unit months available and unit months leased for all units in the development (ACC and non-ACC).

PIH Notice 2011-07. For both FDS line 11190 (Unit months available) and 11210 (Unit months leased), PHAs should refer to PIH Notice 2011-07, *Guidance on IMS/PIC Development Sub-Module Reporting and Validation* (and any subsequent notices that supplement or supersede PIH Notice 2011-07), for guidance on the use of public housing units and the reporting of these units in IMS/PIC.

Supporting Documentation. The reported amount should be supported by the PHA’s tenant rent rolls, HUD approvals, and other unit inventory records.

Appendix A- HUD PHA Occupancy Percentage Calculations. Appendix A of this accounting brief provides a summary chart of HUD’s PHA occupancy percentage calculations for the Management Operations and Capital Fund Program Indicators under the PHAS Interim Rule. In addition, the chart also provides the Public Housing occupancy percentage calculation under HUD’s Agency Priority Goal Reporting.

Reporting Vouchers under the Housing Choice Voucher Program

11190 - Unit months available. For the HCV program, FDS line 11190 (Unit months available) is comprised of the sum of three (3) FDS lines (detail link).

- Detail Link 11190-210 (Total ACC HCV Units),
- Detail Link 11190-220 (Unfunded Units), and
- Detail Link 11190-230 (Other Adjustments)

The following provides the actual screen shot from the FASS-PH system for the detail line items for FDS line 11190 of the HCV program.

Screen Shot: FDS Line 11190 HCV Program

Line Item 11190 Details (readonly mode)		
Line Item #	Description	Value
*11190-210	Total ACC HCV Units	<input type="text"/>
11190-220	Unfunded Units	<input type="text"/>
11190-230	Other Adjustments	<input type="text"/>
Total		<input type="text"/>
Back to IncomeStatement		

Note: while the FDS lines 11190-210 and 11190-220 are labeled in the FASS system as “Units”, the FDS lines are defined as unit months.

PHAs should incorporate the following information when determining the number of unit months available (UMA) to report on the FDS for the HCV program.

- **Detail Link 11190-210 - Total ACC HCV Units.** For the HCV program, the PHA is to report the total number of months each voucher was under ACC. If the PHA’s ACC voucher does not vary during the year (i.e., no new increments, etc.), this can be as simple as multiplying the ACC vouchers times 12.
- **Detail Link 11190-220 - Unfunded Units.** The PHA should report the number of vouchers that cannot be funded after the PHA considers both the actual HAP funding (revenue) for the period and the Net Restricted Assets (NRA). This calculation should be based on the average HAP expense.
- **Detail Link 11190-230 - Other Adjustments.** This line item was included to accommodate future policy changes or unique situations and is normally not used by PHAs.

11210 - Unit months leased. This FDS line represents the total number of voucher months under lease by the tenant during the reporting period. The reported amount should be supported by the PHA's monthly HAP register. For the HCV program, the PHA's vouchers leased should be based on the first day of the month.

Illustrative Examples. The examples below show how to calculate and report unit months available (UMA) for the HCV program using the two detail links, Line 11190-210 and Line 11190-220.

Detail Link 11190-210 - Total ACC HCV Units. If the PHA has 200 vouchers (authorized vouchers) under ACC for the entire reporting period (12 months) its total unit months available (UMAs) are 2,400. Therefore, the PHA should report 2,400 (200 x 12 months) UMAs on FDS line 11190-210 (Total ACC HCV Units).

Detail Link 11190-220 - Unfunded Units. If for the reporting period, the PHA leased 2,160 unit months with a total associated HAP expense of \$648,000 the average per unit cost (PUC) is \$300 (\$648,000 HAP expense / 2,160 unit months leased).

If HAP revenue for the year was \$702,000, comprised of \$700,000 from HUD and \$2,000 of other HAP revenue (i.e., HAP interest income, fraud recovery, FSS forfeiture, etc), the current period revenue could fund 2,340 unit months (\$702,000 HAP revenue / \$300 Average HAP expense).

The next step is to take into consideration the PHA's NRA (HAP equity) balance since these funds are available for the payment of HAP expense. However, a PHA does not need to consider all of its NRA balance as being available to fund HAPs since the PHA will also need to maintain a reasonable NRA balance for contingences. Normally HUD considers ½ month of HAP expense to be a reasonable amount of NRA balance to be held out of the calculation but PHAs can increase or decrease this amount based on their individual circumstances.

Scenario 1

For this scenario, the PHA's beginning fiscal year NRA balance is \$72,000 and the PHA considers \$25,000 (which is close to ½ month of HAP expense) as a reasonable NRA balance. Therefore, the HAP equity could fund an additional 157 UMAs ((\$72,000 NRA - \$25,000 reasonable NRA balance) / \$300 average PUC) during the reporting period.

Based on the current period funding and NRA, the PHA had enough funds to lease 2,497 UMAs (2,340 UMAs funded from HAP revenue plus 157 UMAs funded from NRA).

Since the PHA only had 2,400 authorized UMAs (200 vouchers under ACC for the period), no vouchers are considered unfunded and FDS line 11190-220 (Unfunded Units) should be reported at zero.

Scenario 2

For this scenario, the facts from scenario 1 remain the same except that the PHA's beginning fiscal year NRA balance is \$37,000 (and not \$72,000). Therefore, the number of additional UMAs that could be funded from NRA is 40 ((\$37,000 NRA - \$25,000 reasonable NRA balance) / \$300 average PUC).

Based on the current period funding and NRA, the PHA had enough funds to lease 2,380 UMAs (2,340 funded from HAP revenue plus 40 UMAs funded from NRA). Since the PHA

has 2,400 UMAs under ACC, but only had enough funds to lease 2,380 unit months, 20 unit months (2,400 UMAs – 2,380 funded unit months) are considered unfunded and FDS line 11190-220 (Unfunded Units) should be reported at -20.

The following table summarizes the example under the two scenarios shown above.

FDS Lines	Scenario 1	Scenario 2
11190-210 Total ACC HCV Units	2,400	2,400
11190-220 Unfunded Units	0	-20
11190-230 Other Adjustments	0	0
11190 – Unit Months Available	2,400	2,380
11210 – Unit Months Leased	2,160	2,160

FDS Line 1190-220 Unfunded Units – Other Reporting Considerations. The unfunded calculation illustrated above may need to be modified by the PHA based on the PHA’s particular situation. For example, if the PHA was awarded extraordinary administrative fees to cover a HAP deficit, this revenue should also be considered as a funding source for HAP during the reporting period. Similarly, if the PHA makes use of any available UNA or a non-federal source of funding during the reporting period these amounts will also be considered in determining total funds available to support the PHA’s vouchers. For example if during the reporting period the PHA received \$700,000 in HAP revenue from HUD, had \$2,000 from HAP interest, fraud recovery, and FSS forfeiture, used \$50,000 of its NRA plus \$25,000 from its UNA for HAPs, the total funding used to determine any unfunded units would be \$777,000. Based on the \$300 PUC from the example above, the total unit months supported by this amount is 2,590. Since the PHA is only authorized a maximum of 2,400 unit months (200 vouchers), there are no unfunded unit months.

UMLs greater than UMAs. Where a PHA has leased more unit months than its authorized UMAs during the reporting period, the PHA will report the actual UMLs on FDS line item 11210 – Unit months leased. In this case the PHA’s UMLs (FDS line 11210) will exceed UMAs (FDS line 11190).

Port-In Units. Port-in units that are administered by the PHA and that have not been absorbed into the PHA’s own program should not be reported in the PHA’s UMA and UML FDS lines. Instead this unit information should be reported in the FDS of the initial PHA.

Supporting Documentation. The reported amount should be supported by the PHA’s HAP register, and other management reports.

Voucher Utilization. The unit months available and unit months leased as reported on the FDS helps inform and aid HUD and other users of this financial information in analysis of the HCV program. However, HUD’s official voucher utilization is calculated independently and the FDS reporting does not supersede HUD’s voucher utilization calculation or change any reporting requirement in the Voucher Management System.

Appendix A – PHA Occupancy Percentage Calculations

PHA Occupancy Percentage Calculations

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

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

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

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

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

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