



Public Housing Authorities Directors Association

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June 25, 2007

Honorable Orlando J. Cabrera
Assistant Secretary
Public and Indian Housing
U.S. Department of Housing
and Urban Development
451 Seventh Street, SW
Washington, DC 20410-0001

Dear Secretary Cabrera:

At its annual convention June 3-6, PHADA set aside a special two and a half hour session called "Jeopardy with Joe Schiff." The Jeopardy categories were the same ten (10) focus group topics that HUD has proposed under its Public Housing Administrative Reform Initiative. The "Jeopardy" format was chosen as an attractive and easy way to encourage housing authority directors and other attendees to submit ideas about federal regulation-based rules and procedures that could be eliminated or streamlined.

The Jeopardy exercise yielded a total of fifty-seven (57) suggestions that are attached here. PHADA thought HUD would be interested in seeing this list of deregulation targets since the Department is embarking on its own dialogue with authorities through the reform initiative. PHADA attempted to limit suggested changes to those based in regulation, but that effort may not have screened out all recommendations based in statutes. PHADA is providing the results pretty much in the form they were received. I want to stress that PHADA does not necessarily endorse all of these recommendations. The association will spend time with this list and, no doubt, take some of these ideas, develop them into policy recommendations and ask our Board of Trustees for formal endorsement of some.

PHADA was pleased with both the attendance at this session and the level of housing authority involvement and discussion. Engaging Mr. Schiff or other knowledgeable facilitators, HUD should consider sponsoring similar Jeopardy sessions at state and regional meetings it attends this year.

Sincerely,

Timothy G. Kaiser
Executive Director

cc: Elizabeth A. Hanson
Gregory Byrne

Jeopardy
Deregulation Responses
PHADA Annual Convention
June 6, 2007

Occupancy:

- 1.) **Suspend non-statutory income disallowances until housing authorities receive full funding.**
- 2.) **Eliminate non-statutory grievance procedure elements for housing authorities in states with a HUD-approved due process as was done for drug-related evictions.**
- 3.) **Eliminate all non-statutory income exclusions.**
- 4.) **When funding is prorated, allow either a rental application fee or allow a cost pass-thru for criminal background checks.**
- 5.) **Allow sanctions against residents who willfully end employment in order to reduce their rent.**
- 6.) **Allow income verifications data to be 6-months old at time of admission (multifamily allows 120 days).**
- 7.) **Eliminate the medical deduction and give senior and disabled residents a flat deduction.**
- 8.) **Dramatically simplify the non-statutory rent calculation process.**
- 9.) **“Incentivize” fraud oversight by allowing housing authorities to retain all recoveries from fraud.**
- 10.) **Allow residents on fixed incomes to be recertified every three (3) years.**
- 11.) **Simplify the process for rent calculation for households containing illegal aliens.**
- 12.) **Allow documented telephone verification of data for admission and recertification as a first option when subsidy is pro-rated.**

Capital Fund:

- 1.) **Allow Request For Qualifications (RFQ) with negotiated contracting instead of competitive bidding for construction contracts.**
- 2.) **Reward high performance housing authorities with redistributed recaptured capital funds.**

- 3.) **Streamline and dramatically simplify the approval of leveraged transactions by TRUSTING 3rd party partners.**
- 4.) **Eliminate environmental assessment requirements for all non-statutory work.**
- 5.) **Change monthly Capital Fund Plan (CFP) reports to quarterly reports.**
- 6.) **Instead of requiring endless submissions of Capital Fund Plan, if funds increase, automatically place the increase in contingency line item, if funds decrease; reduce budget line items on a pro-rata basis.**
- 7.) **Instruct the HUD Field Offices that they should approve the use of CFP funds for anything allowable under the law unless the housing authority is abusing its funds.**
- 8.) **Capital Fund bonuses should not be delayed because of HUD timing issues with REAC inspection and/or resident surveys. HUD “bottlenecks” should not create costs to housing authorities.**

Resident Involvement/Self Sufficiency:

- 1.) **Allow self certification of community service.**
- 2.) **Get out of the business of dictating how agency-wide resident organizations are organized and operated.**

PHAS/Oversight:

- 1.) **Replace UPCS inspections with HQS inspections.**
- 2.) **Allow housing authorities to modify PHAS and/or SEMAP when significant program changes and/or under-funding occur.**
- 3.) **No new requirements shall be implemented without favorable pre-testing in the field.**
- 4.) **Restrict HUD oversight to public housing properties and/or programs.**
- 5.) **Eliminate peer review and make static the financial indicator in PHAS.**
- 6.) **Housing authorities should have another level of appeal for PHAS before an independent third party. (give HAs same appeal rights as residents)**
- 7.) **Enhance HUD Field Office consistency by developing a national database showing discretionary decision and make it transparent to housing authorities.**

- 8.) **Create consistency among HUD Field Offices or pay for psychiatric coverage for executive directors.**
- 9.) **Quality control inspections should follow, rather than precede, UPCS inspections.**
- 10.) **Simplify the appeal process for resident-caused UPCS inspection findings.**
- 11.) **Limit the number of housing authority audits/ reviews that take place in any one year.**

Development:

- 1.) **Move demolition/disposition to the field offices and simplify.**
- 2.) **Eliminate environmental reviews wherever not statutorily required, especially with disposition applications.**
- 3.) **Dramatically simplify the approval process whenever housing authorities are purchasing from other government entities.**
- 4.) **Simplify the disposition process of surplus property.**

Homeownership:

No suggestions

General Management/Annual Plan:

- 1.) **Allow more discretion in financial investment vehicles used by housing authorities.**
- 2.) **Simplify the HUD wage rate system.**
- 3.) **Apply HUD wage rates only over a threshold of \$100,000.**
- 4.) **All HUD documents expected to be shared with residents should be translated into various languages by HUD and available by download.**
- 5.) **Tell each HUD Field Office to lead a deregulation session (like this) with their housing authorities.**
- 6.) **Make wage rate requirements consistent with those for assisted housing.**

Operating Fund:

- 1.) **Adopt PHADA ASSTMGT suggestions.**
- 2.) **Provide flexibility to use utility savings.**
- 3.) **Suspend the requirement to adjust the utility allowance when the housing authorities are under funded.**
- 4.) **Give \$2 PUM as reward to small housing authorities for asset management.**
- 5.) **Allow small housing authorities to achieve stop-loss status for one AMP.**
- 6.) **Raise the asset management threshold to housing authorities with 500 public housing units (current cap is 250).**
- 7.) **Allow housing authorities to reconfigure AMPs without HUD involvement through 2008.**

Systems:

- 1.) **Neuter the 50058 monster and replace it with periodic surveys.**
- 2.) **Increase timely reports from HUD to housing authorities.**
- 3.) **Give one year prior notice when computer systems must be changed. Housing authorities do not have the human and financial resources to make system changes quickly.**
- 4.) **No retroactive requirements should be applied to housing authorities.**

Submission Requirements:

- 1.) **Eliminate MBE and Section 3 submissions.**
- 2.) **Review all HUD-required submissions and eliminate all that are not used at least monthly by HUD.**
- 3.) **Simplify forms for maintenance wage rates.**