

Dear PHA Representative or Vendor,

This letter offers an update regarding the Federal Register Notice Public Housing: Physical Needs Assessment, commonly referred to as the Green Physical Needs Assessment (GPNA) rule, that has been pending publication for some time now. You may recall a previous update provided by Bruce Reider in October, 2015 that explained that Congress placed a prohibition in the 2015 appropriations law. This prohibition barred the Department from “requiring or enforcing” a physical needs assessment during the 2015 fiscal year. In response, the Department placed issuance of the PNA rule on hold. Additionally, the Capital Programs Division could not enforce the long-standing PNA submission requirement as found in 24 CFR Section 905.300(a). Congress reissued the prohibition as part of the FY 2017 appropriations bill, which is our most recent appropriations bill. You may read that entire 2015 message [here](#)

Further, per Executive Orders 13777 and 13771, on December 22, 2017, the Department published Federal Register Notice Withdrawal of Proposed Rules To Reduce Regulatory and Financial Burden. This Federal Register Notice rescinded five proposed rules, among them the GPNA rule. However, the Department remains supportive and welcomes the receipt of voluntary PNA submissions. Additionally, the Capital Programs Division continues to encourage that PHAs conduct and utilize PNAs or formal capital needs assessments and scheduled assessment updates, for the effective management of their assets. Formal capital needs assessments are an important industry-wide accepted tool to manage multiple areas of real estate operations, in addition to managing short and long-term capital needs.

We offer some additional updates below on the following topics:

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Voluntary Submissions

HUD continues to strongly encourage PHAs to perform physical needs assessments and to make voluntary submissions to the Department. To date HUD has received approximately 500 voluntary

submissions representing around 7% of active public housing units, continues to receive and process requests from PHAs for their unique PIC data file used to populate the HUD PNA tool.

Completing a PNA has many benefits to a housing authority. For some agencies, this might represent a first or long overdue attempt to fully capture the condition and needs of the entire portfolio of inventory. Further, as many PHAs continue to pursue funding opportunities such as CFFP, RAD, and LIHTC, the PNA assessment can help the PHA with strategic planning and decision making regarding investments in their portfolio, including essential prioritization. It can be cited as solid evidence of need, and coupled with sound strategic plans to address that need. It also offers insights that are valuable in the operations and maintenance of units, buildings and sites, including budgeting and procurement related considerations. For example, a PHA might use the results of the PNA to inform decisions about the use of Capital Funds, including decisions regarding exercising the flexibility of converting some or all of those funds to Operating Funds (as applicable). Lastly, a PNA reflects a best practice across the multi-family housing industry.

HUD will continue providing PIC data sets and accepting voluntary submissions of PNA data. Requests for PIC data files to begin the PNA may be obtained by emailing a request with your PHA number and PHA contact to: PHAPNA@hud.gov.

If your PHA has already performed a PNA in the HUD PNA tool format, we encourage you to submit the data to us by attaching the tool-generated .XML data files to an email to PNADATA@hud.gov. **It is important to point out that PHAs may submit any AMPs/Developments from their portfolio that are fully completed; they do not need to await total completion of all the entire PHA portfolio of AMPs/Developments.** HUD encourages these partial submissions. As HUD continues to receive and process PNA data, we can build a more complete and updated picture of the needs across the nation. This data is often requested and shared with senior administration personnel and Congress.

Resources

Resources for the PNA are available including the user guide for the tool, frequently asked questions, webinar/webcast training archives access, a training guide, sample request for proposal documents, instructions for “cross walking” PNA data from another format (XML Schema), an expected useful life table, and other items. Technical assistance (TA) will continue to be available through your field office, HUD headquarters, and TA consultants. For TA needs, please email the request to the field office that serves you; the field office will then refer any requests it cannot fulfill to HUDPNA@hud.gov.

Request for PNA Feedback

If you have any input on the PNA tool, process, or requirement, we encourage you to share that information by submitting your comments to HUDPNA@hud.gov. This will enable us to track and consider the feedback in any future updates. We are especially interested in hearing of the barriers to conducting a PNA or to submitting the data.

PNA Tool System Requirements

Note that the currently available version of the PNA tool is designed for full compatibility with Microsoft Office 2007 or 2010. The export reports feature does not work with Office 2013. Further, the tool functions best with Windows XP, Vista and 7. Information on the Tool's performance in environments with Office 365/2016 and Windows 8 or newer operating systems is still being collected; please feel free to report any issues or bugs to HUDPNA@hud.gov.

Logo Change

In 2012, HUD released the PNA tool for use by PHAs for long term project based strategic planning. This tool was commonly referred to as the "GPNA" or "Green Physical Needs Assessment" tool, in reference to the inclusion of a component of the tool designed to capture energy audit and related information. However, HUD has taken steps to remove the reference to "Green" from the tool name and logo. The tool will simply be referred to as the "PNA" tool. When a new version of the PNA tool is released with the updated logo, a memo will accompany its release to notify users of the change and address any confusion that may arise. While older training and other collateral materials may still contain the initial "GPNA" visual logo or verbal reference, HUD will attempt to update current materials and will use the "PNA" logo exclusively in future development. As mentioned, the tool itself will be re-released in the future with the revised logo and title, among other changes. The PNA tool still allows energy audit data to be integrated into the PHAs long term plan to allow the PHA to evaluate energy efficient improvements on a continuous basis.



Figure 1: GPNA logo in use currently



Figure 2: PNA logo in future editions