



**U.S. Department of Housing and Urban Development
Office of Public and Indian Housing**

Special Attention of:
Regional and Field Office Directors of Public
Housing; Financial Management Center;
Public Housing Agencies Administering
Housing Choice Voucher Programs; Regional
Directors; State and Area Coordinators

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Cross References: PIH Notice 2008-38

**Subject: Disaster Housing Assistance Program-Ike (DHAP-Ike) Case Management
Guidelines**

1. Purpose.

These operating requirements set forth the policies and procedures for the Disaster Housing Assistance Program-Ike (DHAP-Ike) case management services. DHAP-Ike is a HUD-FEMA initiative to provide monthly rental assistance, case management services, and security deposit and utility deposit assistance for certain families displaced from their homes by Hurricane Ike.

DHAP-Ike has been modeled after the current Disaster Housing Assistance Program (DHAP) for families displaced by Hurricanes Katrina and Rita that is administered by HUD's network of public housing agencies (PHAs). PHAs that agree to administer DHAP-Ike must do so in accordance with these requirements and any subsequent HUD directives and guidance for the program. These guidelines set forth the policies and recommended practices for Disaster Housing Assistance Program (DHAP) – Ike case management services.

During the time that families are assisted under DHAP-Ike, each FEMA designated family Head of Household is required to participate in case management services. The objectives of these services are greater self-sufficiency and permanent housing for participating families.

In addition to the mandatory elements described in this notice, a number of recommendations are provided by HUD in these guidelines to assist PHAs in developing successful case management programs. PHAs are encouraged to consider these additional elements in providing case management services. Please note that case management and IDP requirements that apply to families are not created by this notice,

but rather must be determined, after discussion with the family, on an individualized basis, and agreed upon in writing and executed by the family.

2. Background.

In August and September, 2008, Hurricanes Ike and Gustav struck the United States, causing catastrophic damage to property, loss of life, and the displacement of tens of thousands of individuals from their homes and communities. On September 23, 2008, HUD and FEMA executed an Interagency Agreement (IAA) under which HUD shall act as the servicing agency of DHAP-Ike and will begin administration of the program effective November 1, 2008.

HUD will utilize its existing network of local PHAs to administer tenant-based rental assistance and provide case management services to impacted families under DHAP-Ike. PHAs administer the Housing Choice Voucher (HCV) Program and as a result have the necessary local market knowledge and expertise in assisting families through a tenant-based subsidy program. In addition, through their administration of the DHAP, the Disaster Voucher Program (DVP) and the Katrina Disaster Housing Assistance Program (KDHAP), PHAs are experienced in working with significant numbers of families that have been displaced by disasters.

Pursuant to FEMA's grant making authority, grants will be provided to local PHAs to administer DHAP-Ike on behalf of FEMA. PHAs will make rental assistance payments on behalf of eligible families to participating landlords for a period not to exceed 17 months commencing November 1, 2008 and terminating on March 13, 2010.

In order to prepare the family for this eventuality, case management services are provided for the entire duration of DHAP-Ike. These case management services include assisting participants to identify non-disaster supported housing solutions such as other affordable housing options that may be available for income eligible families. PHAs are responsible for the provision of case management services to the DHAP-Ike participating families.

3. Correction to PIH Notice 2008-38 DHAP-Ike Operating Requirements

This notice serves to update and correct PIH Notice 2008-38. There are two references to the DHAP Case Management software system of record (Tracking-At-A-Glance or TAAG) within section 3, the General Overview, and section 4n, PHA Case Management. These references were included in error. There will be a new case management system of record for DHAP-Ike (Efforts to Outcomes or ETO) as detailed in section 5 of this notice.

4. Program Structure.

(a) Case management provider

PHAs may choose to provide case management services in-house, through a contract or through a partnership with another local service provider. Regardless of the delivery option implemented by the PHA, the PHA is ultimately responsible for the provision of case management services; reporting outputs and outcomes to HUD; and documenting that case management services are being provided to the family.

If a PHA chooses to contract with another entity for the provision of case management, the Request for Proposals and contract must require the contractor to adhere to HUD's case management guidelines, use the DHAP-Ike Case Management Reporting System provided by HUD, and report valid data in this system. HUD recommends that contracts with outside providers be performance based, with performance elements linked to the case management metrics reported to HUD in the DHAP-Ike Case Management Reporting System.

Many PHAs may have a very small DHAP-Ike caseload, and given this scale, the amount of funding provided for case management may not be sufficient to support a full-time contractor or PHA staff dedicated to the provision of DHAP-Ike case management services. In these situations, the PHA can meet the case management requirement by partnering with organizations already serving the families, or by integrating DHAP-Ike case management services into existing PHA programs. The case management funding attached to the family under DHAP-Ike, even if the amount is small, should cover the extra costs associated with data entry in the DHAP-Ike Case Management Reporting System for services that are provided through existing case management programs.

Some families assisted by DHAP-Ike may have limited English proficiency. In order to ensure equal access to case management services, case management service providers should have bi-lingual case managers, or qualified translators, available when needed to assist with intake, home visits, compliance issues, and the development of IDPs. Printed DHAP materials may need to be translated into different languages by the PHA.

(b) Case Management Implementation

There are two phases in the implementation of DHAP-Ike case management services. Phase One is a pre-transition case management and intake process before the family is under a Disaster Rental Subsidy Contract (DRSC). During this phase the PHA should outreach to the head of household, ensure that certifications of family obligation are signed, identify service providers already assisting the family, ensure that the head of household signs a Release of Information (ROI) form, complete an initial assessment of immediate needs with the head of household, and provide preliminary case management services, including service referrals relative to immediate family needs.

Phase Two is full implementation of case management services for the family after execution of the DRSC. This phase shall include a full baseline needs assessment that is updated quarterly and a caseload triage (which is automated based on responses to the Needs Assessment). The needs assessment must be completed quarterly, and must include the quarterly update of several sections including the income and assistance

section, establishment of individual development plans (IDP) and ongoing service connections relative to family needs and goals. The baseline needs assessment and caseload triage must be completed within 30 days of executing the DRSC.

5. DHAP-Ike Case Management Reporting System.

(a) System Overview

PHAs are required to report case management outputs and outcomes through ETO (Efforts to Outcomes) case management software which is the DHAP-Ike Case Management Reporting System for the duration of the program. The system is accessed at www.DHAP-Ike.com. Users must complete the online registration process, and have this registration approved by HUD, before they are granted access to the system.

The ETO (Efforts to Outcomes) system is web-based and designed for use by case managers to input data as they work with families. This data will include, but is not limited to: needs assessments and reassessments; certification that family obligations and ROIs have been signed; IDP goals and target dates; progress across IDP goals; caseload triage categorization; program and service referrals, enrollments and completions; resident outcomes; and level of effort by the case manager, such as number and types of contacts with each individual. The system compiles this data and automatically generates reports on case management services for the case management contractor or service partner, PHA and HUD without additional data processing.

The system also allows case managers to maintain electronic case files, which are stored in the system, reducing the size and quantity of hard-copy files that must be maintained. The system has a full back-up located in a hurricane proof location, with capacity for 24 hour access, seven days a week. The system has numerous confidentiality and security firewalls.

In addition to automatically generating reports on case management outputs and outcomes, the system is also a tool for PHAs in managing case management contractors, service partners and individual case managers. The system allows a PHA to monitor each contractor relative to the performance goals established in their contracts, and flags low performing case managers across a number of metrics, including the amount of contact with a family and progress in completing IDPs.

Training is provided on this system by HUD's DHAP-Ike Case Management Technical Assistance (TA) contractor. Training options include on-site regional training sessions within the Gulf Coast region, web-casts, site visits and one-on-one technical assistance. In addition, online tutorials are built into the system for each major reporting component and system element. Contact information for technical assistance resources for case management and software questions are posted on the site at www.DHAP-Ike.com to assist with the provision of case management services, software questions and reporting issues. The TA Provider will also review data quality and may follow-up with PHAs

regarding their case management program, irregularities in DHAP-Ike reports or implementation challenges.

The Disaster Information System (DIS) serves as the primary system of record for the DHAP-Ike program. In recognition of this, household and status changes in DIS will result in automatic updates to the ETO system. What this means is that when a family ends their participant or transfers between PHAs, this will be reflected in ETO automatically during the weekly update process. This will reduce discrepancies between the systems and eliminate the need to perform reconciliations across the two systems.

The names of eligible DHAP-Ike families are loaded into the ETO (Efforts to Outcomes) system from the Disaster Information System (DIS). As new families become eligible for DHAP-Ike, their names will also be loaded into the system through weekly DIS updates. If a family transfers from one DHAP-Ike PHA to another, the case will be transferred to the new DHAP-Ike PHA in the case management reporting system as part of the weekly DIS data transfer. This update process may result in a slight delay of information between the systems.

(b) ETO System Registration Process

To gain access to ETO, a Primary Point of Contact (POC) must register for each PHA at www.DHAP-Ike.com. A TA provider will verify the userid request with the PHA. The POC request will be verified within 24 hours. Once registration has been completed, case manager user requests can be processed. When a case manager userid request is made, the POC at their agency will validate and approve access. This verification of case manager requests is maintained at the PHA level to secure access to client's protected information.

HUD is asking all PHAs to have a POC registered with the system by December 1st. Regional training sessions will begin in Houston on December 2nd.

To gain access to the ETO system and receive a userid:

- 1) Go to www.DHAP-Ike.com
- 2) Enter the user name **register** and the password **register1**
- 3) Select **Register for DHAP-IKE Case Management** and hit **Go**

6. Eligibility, non-compliance and case closure.

(a) Eligibility

DHAP-Ike families must participate in case management services as a condition of receiving DHAP-Ike rental assistance. Compliance with the case management requirement applies only to the DHAP-Ike head of household (see Notice PIH 2008-38). However, all family members listed under an active DHAP-Ike lease are eligible for case

management services, and HUD recommends that DHAP-Ike grantees provide these individuals with services.

HUD recommends that each adult family member age 18 or older have their own needs assessment, IDP, triage categorization and service enrollments or completions relative to needs and goals. It is also recommended that dependent minors ages 0-18 be tracked in the DHAP-Ike Case Management Reporting System under services provided to the head of household.

Some families eligible for DHAP-Ike may have a low-level of case management service needs. If families are employed and stable, they would likely be classified as Tier 1 in the DHAP-Ike Caseload Triage, which is described in a following section, and the recommended level of services would be minimal. Even for families with a low-level of service need, PHAs and their partners are required to report on these families in the DHAP-Ike Case Management Reporting System and monitor for case management compliance, but time demands and level of effort would be small for these families relative to those with greater needs.

(b) Non-compliance

Compliance with the case management requirement applies only to the DHAP-Ike head of household. The PHA must have each DHAP-Ike head of household sign a certification of their family obligations that includes participation in case management services. The head of household must also sign the IDP and be given a copy of this document. The IDP must contain language stipulating that failure to comply with the objectives of the IDP could result in termination from the DHAP-Ike program.

An IDP is required because it is the foundation for providing services to families. It itemizes primary and secondary goals that participants have set for themselves with their case manager and guides case managers in identifying specific services that will assist individuals to achieve these goals. Compliance should be measured against the family's effort to actively make progress towards the goals established in their IDP.

Non-compliance with the case management requirement by the head of household is determined by the PHA and defined generally by HUD as:

Failure to establish and actively comply with the IDP based on documentation from an authorized case manager.

Under this definition, HUD requires PHAs to adopt the following minimum standard for non-compliance:

A head of household has missed three (3) consecutive contact attempts (e.g., scheduled meetings, home visits, phone calls and letters) by the case manager regarding case management services. This includes attempts to conduct a needs assessment, sign an ROI form, establish an IDP or provide services to a family

across an IDP. Attempts to contact the family must include at least one (1) home visit, and at least one (1) certified mailing. However, meetings missed because of a legitimate family emergency should not be counted.

The term “minimum standard for non-compliance” means that a client may not be terminated for non-compliance less severe than described in this notice; it does not mean that a client must be terminated if non-compliance as described above occurs. As described elsewhere in this notice, that determination must be made on a case-by-case basis by the PHA.

After the IDP is established, active compliance should be determined by the case manager on the basis of a head of household’s effort to make progress across goals in the IDP. For example, a head of household might fail at meeting all goals in their IDP, but could be defined as actively complying with the IDP so long as a case manager determines that they made sufficient effort, given their household circumstances, to achieve these goals. Under no circumstance should a household be terminated for non-compliance on the basis of missing one interim goal in their IDP. Failure to comply with the IDP should be based on a pattern of behavior.

Case managers must explain the consequences of non-compliance to each head of household, and make every effort to bring the head of household into compliance. As part of this, case managers should be given the authority to renegotiate the IDP with a head of household to bring them into active compliance with the case management requirement if they feel that it is warranted given household circumstances. During this process the head of household should be provided with notification that their case is being reviewed for non-compliance by their case manager. This notification should detail the reasons the case is being reviewed for non-compliance, and request that the head of household contact the case manager to discuss the matter and work with them to take corrective actions.

If the head of household continues to be non-compliant, case managers should inform the PHA that the head of household is non-compliant and provide supporting documentation. Case managers can only make recommendations to the PHA on cases that should be considered for non-compliance with the case management requirement.

PHAs must establish local policies for non-compliance with the case management requirement that include HUD’s definition and minimum standards for non-compliance. PHAs may set a higher threshold for non-compliance based on local and family circumstances. These policies must be shared with participating DHAP-Ike heads of household and available for review by HUD.

The PHA will make all final decisions on head of household non-compliance with the case management requirement and provide the head of household with the following:

- Written notice containing a clear statement of the reasons for termination;

- A review of the decision, in which the head of household is given an opportunity to present written or oral objections before a person other than the case manager that referred them for non-compliance. This hearing process should be consistent with the DHAP-Ike Standard Operating Procedures and guidance provided in Notice PIH-2008-38 and any subsequent HUD directives or guidance for the program.
- Provide prompt written notice of the final decision to the head of household.

(c) Case closure

The PHA must notify Case Managers when a head of household is terminated for cause, either for not participating in case management services or for non-compliance with other DHAP-Ike rental assistance requirements. The PHA must also notify Case Managers when a head of household voluntarily leaves the DHAP-Ike program or transfers to the jurisdiction of another DHAP-Ike grantee.

Only families receiving DHAP-Ike rental assistance are eligible for case management services under this program. If a head of household refuses DHAP-Ike rental assistance, is terminated for cause or leaves the DHAP-Ike rental assistance program (including those that transition to permanent housing during the life of the DHAP-Ike program) they are no longer eligible for DHAP-Ike supported case management services and the case must be closed.

If a case has been closed in DIS the record will automatically close in ETO during the weekly data transfer process. Case managers will receive an email notification of the case closure. At the time the case closure is received within ETO, the record will be locked. If case managers have final notes and updates for a client record the POC or assigned manager will have administrative rights to unlock the record and allow for final updates which should include inputting the final needs assessment, any resident notes and contacts, as well as client progress across IDP goals.

HUD recommends that case managers have the discretion to close cases for individual family members who are not the head of household. It is also recommended that case closure for these family members be based on documented in-activity. However, this in-activity does not trigger non-compliance with case management services as it does with the head of household. Therefore, case closure of other family members will not jeopardize receipt of DHAP-Ike rental assistance for the family.

(d) Eligibility for Continued Assistance

Unless the family qualifies for continued assistance as demonstrated by their current housing need, DHAP-Ike rental assistance and case management services will end for participating families on the earlier of:

- (1) Six months following the effective date of the initial DRSC executed on behalf of the family; or

(2) July 31, 2009 (see PIH Notice 2008-38).

Under all instances of a case closure, case managers should work closely with local service providers within the state of Texas, implementing FEMA's Disaster Case Management Pilot (DCM-P) for case management services detailed below.

7. Coordination with FEMA State Grantees and Local Long-Term Recovery Councils

- (a) FEMA is developing a Case Management Pilot Program designed to gather best practices to assist in the formulation of the Agency case management model for future disasters as required under the Post Katrina Emergency Management Reform Act.

To achieve this, FEMA will provide grant funding to the State of Texas for the Disaster Case Management Pilot (DCM-P) for case management services or activities necessary to meet the needs of disaster impacted clients. Families who are not eligible for DHAP-Ike, as determined by FEMA, can receive case management services through the DCM-P.

Within the state of Texas, PHAs should coordinate their efforts with these state funded entities. At a minimum, one objective of this coordination should be to refer clients who are no longer DHAP-Ike eligible and share case management history where appropriate. To facilitate these referrals, all DHAP-Ike participants must sign a Release of Information form.

- (b) Unlike DHAP assistance for Hurricane Katrina and Hurricane Rita impacted households, DHAP-Ike is being implemented much closer to date of the disaster. As a result, DHAP-Ike participants are likely to have immediate disaster related needs.

PHAs and their case managers should work closely with their local Long-Term Recovery Committee (LTRC). This work shall include attending local LTRC meetings and presenting cases for referrals where necessary. If a DHAP-Ike case is presented to the LTRC this referral should be noted in ETO. HUD will be tracking LTRC referrals along with other service referrals.

8. Minimum case management standards

HUD recommends that PHAs implement a family-based case management model. Under such a model all family members listed on an active DHAP-Ike lease are provided with case management services. HUD also recommends that this model be consistent with an asset or strengths-based approach. Building on each family's strengths and current resources will pave the way for efficient and successful case management.

Case management is important for families that do not have a source of income, are on a fixed income, require supportive services, or need permanent housing. Some subsets of the disaster-impacted population need more assistance than others, and case management services must be tailored to the level of need – in terms of intensity and duration of service. The goal is to secure permanent housing for DHAP-Ike families before the family’s eligibility for continued assistance under the DHAP-Ike ends as outlined in the HUD Notice PIH-2008-38 and move these cases to closure. Employment will not be possible for some individuals, such as the elderly and disabled, and the goals for these individuals must minimally include permanent housing and connection to long-term supportive services providers.

DHAP-Ike case management services must be consistent with the following minimum standards:

(a) Needs Assessments

Needs Assessments for all heads of household must be conducted to determine service needs. All elements of the Needs Assessments should be completed for each head of household. Needs Assessments must be completed not later than 30 days after the DRSC has been executed. After establishment of the baseline Needs Assessment, the Assessment must be updated every quarter while the head of household is active in the DHAP-Ike.

HUD also recommends that separate needs assessments be completed for all family members age 18 years or older.

The PHA, their contractor, or partner must use, at the minimum, the needs assessment questionnaire provided by HUD through the DHAP-Ike Case Management Reporting System. If a needs assessment has already been completed or updated by a local partner within the last three months, this information can be used, but some new questions may need to be asked from the DHAP-Ike questionnaire.

(b) Individual development plans

IDPs must be established for each head of household based on the information gained during the needs assessment. Goals in the IDP must have completion dates set no later than March 13, 2010. The IDP must be reviewed with the head of household and updated not less than once every quarter for the duration of the program.

HUD also recommends that separate IDPs are established for all family members age 18 years or older

Although additional self-sufficiency goals may be established for each family member based on their individualized needs, the primary self-sufficiency goal for each family member must be permanent housing. For those that are able, employment should also be a secondary goal. HUD recommends that case managers move families to permanent housing and case closure as soon as possible. Although important in their own right, secondary goals should also support the achievement of the primary goal. An example of a secondary goal includes education and training, which would assist a family member remove barriers to employment.

(c) Service referrals and inter-agency coordination

Service referrals must be made by case managers relative to the IDP for each individual. Particular attention must be paid to assisting individuals navigate and secure permanent housing and employment, and connect to public benefits that they may be eligible for, including disaster benefits. Social services referrals, enrollments, and resident outcomes must be documented in the DHAP-Ike Case Management Reporting System by the PHA, its contractor or partner organizations. PHAs will be monitored against the service referrals entered into the system including referrals made to their local LTRC.

HUD recommends that case managers identify groups already serving the families, and work with them to maintain continuity of existing services and coordinate any new services. In some cases, families may already be receiving case management services. In these situations, HUD recommends that the DHAP-Ike case manager strive to share case management responsibilities with the provider. This could involve each group providing a different set of complimentary case management services to reduce service redundancy, and increase program efficiency and effectiveness.

(d) Caseload triage

Follow-up with each family member must be determined by case managers based on the level of need for each family member and HUD's caseload triage framework. The caseload is triaged within the DHAP-Ike Case Management Reporting System across the following four tiers, which will be automated based on client responses to the needs assessment:

- Tier 1 – Little to no assistance needed;
- Tier 2 – Some assistance needed;
- Tier 3 – Substantial assistance needed; and
- Tier 4 – Extensive assistance needed.

The DHAP-Ike Case Management Reporting System provides case managers with a recommended frequency of contact for each individual based on their triage tier. The recommend frequencies are:

- Tier 1 – quarterly monitoring to update status and data;
- Tier 2 – monthly contact;
- Tier 3 – bi-weekly contact; and
- Tier 4 – weekly contact.

The caseload triage must be reviewed with the head of household and updated not less than once every quarter for the duration of the program.

(e) Caseload ratio

The maximum average caseload ratio of case managers to households must not exceed 1:50. PHAs and their contractors have the flexibility to assign less than 50 or more than 50 cases to individual case managers in response to special needs, so long as the average across all case managers does not exceed the 1:50 ratio.

(f) Reassessments

HUD requires that reassessments are conducted a minimum of once a quarter for the duration of the program, with more frequent reassessments for individuals deemed to have greater needs under the caseload triage framework. HUD recommends a face-to-face meeting between case managers and clients at least quarterly.

As part of the reassessment process, updates must be completed for the following sections of the needs assessment:

- (1) Income Information
- (2) Employment
- (3) Employment Readiness

(g) Home visits

To the extent possible, HUD recommends that case managers conduct at least one home visit as part of their regular work with families, particularly for those with the greatest level of need.

(h) Release of Information

The PHA or its case management partners must have each DHAP-Ike family member age 18 or older who participates in case management services complete a ROI. The ROI must authorize the case manager to

report information in the ETO system and share information with service providers consistent with the goals established in the IDP for each family member. The ROI must also authorize the PHA to transfer case management data if the family moves into the jurisdiction of another DHAP-Ike PHA.

(i) Confidentiality policies

Each family must be provided with information on the confidentiality policies of the PHA and their case management providers. Case management information must not be shared with outside organizations, except for those to whom participants are being referred for services consistent with identified needs and the IDP, or to PHAs to whom clients are transferring as covered under the ROI.

(j) Case files

Case managers must maintain case files on each individual receiving case management services in a secured location provided by the PHA or case management entity. To the extent possible, HUD recommends that case managers maintain electronic case files on the DHAP-Ike Case Management Reporting System, which includes uploading all necessary documentation and forms, to reduce the size of hard-copy files that are maintained. Hard-copy files will contain information that is subject to the Privacy Act of 1974; appropriate security for the case files should be maintained.

The ETO (Efforts to Outcomes) case file should capture the level of effort and work activity of the case manager. To achieve this, case managers must document information regarding correspondence, home visits, office visits, phone calls and other activities within the Case Management Notes section of ETO.

At the minimum, case managers must maintain a copy of the following documents: a) signed certification of family obligations, b) signed ROI c) signed IDP, and d) any service referral and service completion documentation. A copy of these documents must be stored in a case file and / or online in the ETO system. The DHAP-Ike Case Management Reporting System allows documents to be scanned and uploaded to an electronic case file.

(k) Contractors

Case management contractors or partners must have documented experience in providing case management services to persons with a wide

range of needs. They must also have documented experience in administering case management or social service programs and in working with other local, state, and Federal social service programs.

HUD recommends that the contracts with these organizations be performance based. HUD also recommends that the contracts include specific clauses regarding time allocation. In some instances, case management contractors may have multiple funding streams supporting individual case managers. The contract should specify how much time will be allocated across case managers for DHAP-Ike families and include assurances that the contractor will not bill two sources for the same time.

(1) Intra-agency Coordination

DHAP-Ike rental assistance staff must coordinate activities with case managers. At the minimum, there must be regular meetings between case managers and rental assistance staff. Processes must also be in place to ensure communication across their shared work with DHAP-Ike families. The level of coordination must be consistent with the size of a PHA's caseload - with larger caseloads requiring a significant amount of coordination.

HUD will monitor PHA DHAP-Ike case management performance against these standards

9. Compliance with the Privacy Act of 1974

Each DHAP-Ike grantee is required to protect the information it obtains from residents in accordance with the Privacy Act of 1974.

10. Paperwork Reduction Act Requirements

The information collection requirements contained in this notice have been submitted to the Office of Management and Budget (OMB) under the Paperwork Reduction Act of 1995 (44 U.S.C 3520) and been approved under OMB Control Number 2577-0258 is pending. In accordance with the Paperwork Reduction Act, HUD may not conduct or sponsor, and a person is not required to respond to, a collection of information unless the collection displays a currently valid OMB control number.

11. Additional Information.

Any questions related to this notice should be addressed to the Housing Choice Voucher Management and Operations Division at (202) 708-0477.

/s/

Paula O. Blunt, General Deputy Assistant Secretary
for Public and Indian Housing