

Deregulation for Small PHAs – Requesting to be PHAS Assessed

If your Public Housing Agency (PHA) qualifies for the Deregulation for Small PHAs, (*24 CFR Parts 902, 903, and 985 Deregulation for Small Public Housing Agencies; Final Rule*) you have the option to request to be Public Housing Assessment System (PHAS) assessed in the exempt year. For PHAs who qualify for the exemption, an e-mail notification will be sent from the Office of Public and Indian Housing Real Estate Assessment Center (PIH-REAC) to the PHA Executive Director (ED) indicating the PHA is exempt from PHAS for that year. Once the PHA ED receives this e-mail, the following must be completed to request to be PHAS assessed:

- o Read the entire e-mail notification to confirm that the PHA has been declared PHAS exempt based upon the Small PHA Deregulation Rule.
- o If exempt and you choose to be PHAS assessed, the PHA ED must e-mail the PHAS mailbox at phas@hud.gov within **10 calendar days** after the e-mail notification has been sent by the PIH-REAC. The e-mail must include the following:
 - PHA name
 - PHA ID
 - Fiscal year end (FYE)
 - A forwarded copy of the e-mail notification received from the PIH-REAC
 - A clearly stated request to be PHAS assessed
 - Executive Director name
- o If the PIH-REAC does **not** receive an e-mail before midnight on the 10th calendar day after the notification is sent, it will include the PHA in the PHAS exempt list. Due to strict timeframes needed to order inspections and a resident survey, requests for an assessment received after 10 calendar days **cannot** be honored. An example timeline for the 6/30/04 FYE PHAs is provided below:

Step	Activity	Date
1	PHA ED receives Deregulation for Small PHAs exempt e-mail from PIH-REAC approximately five (5) months prior to FYE.	Monday, February 2, 2004
2	PHA ED e-mails the PHAS mailbox if they would like to be PHAS assessed.	Thursday, February 12, 2004
3	PIH-REAC determines the final Deregulation for Small PHAs exempt list.	Friday, February 13, 2004

- o Within 2 business days of the request, the PHA ED will receive an e-mail confirmation from the PIH-REAC acknowledging receipt of the request to be PHAS assessed.
- o Please note the following considerations when determining if you would like to request to be PHAS assessed:
 - If a PHA is exempt from PHAS, the previous year’s score will be used for capital fund bonus purposes.
 - If a PHA is exempt from PHAS, their designation in the PIH-REAC PHAS system will show “Small PHA Deregulation”. It will not show the previous year’s PHAS score or designation.

- If a PHA requests to be PHAS assessed in an exempt year, a new PHAS score will be generated for that year, which may result in a **lower score and designation**. For example, if the PHA is a high performer in Fiscal year (FY) 2002 and is exempt from PHAS for FY 2003, they may request to be PHAS assessed in FY 2003. Once assessed, the FY 2003 score may drop the PHA's designation to standard performer, and therefore no capital fund bonus would be provided to that PHA.
- If a PHA requests to be PHAS assessed in an exempt year, they will be **assessed again** the following year. Requesting to be PHAS assessed in an exempt year does not lead to an exemption the following year.

Should you have any questions regarding the process for requesting to be PHAS assessed, please e-mail the PHAS mailbox.