

FR Notice to Solicit Input on HUD-50900-MTW (2577-0216) Matrix

Commenter	Full Comment	HUD Responses
San Diego Housing Commission (SDHC)	SDHC supports the removal of the standard metrics within the HUD Form 50900 and the addition of the optional narrative, self-reported PHA data, and participant success stories; Removing the standard metrics will not negatively affect SDHC's performance of its functions.	Thank you for your comments and general support for removing the standard metrics and providing narrative options to MTW PHAs. We will continue to work with the MTW Collaborative in determining alternative outcome measures that can be meaningful while minimizing burden.
San Diego Housing Commission (SDHC)	SDHC recommends that HUD continue to work with the MTW Collaborative and the MTW agencies on the data HUD proposes to compile in lieu of the standard metrics to ensure that HUD and MTW agencies agree with the metrics and how they are conveyed to demonstrate progress toward the three MTW statutory objectives.	HUD will continue to work with the MTW Collaborative in determining alternative outcome measures that can be meaningful while minimizing burden.
San Diego Housing Commission (SDHC)	The notice underestimated the burden per year per respondent, given the number of implemented activities in SDHC's MTW Plan. The number of hours to prepare the "Ongoing MTW Activities" will likely exceed 10 hours even with the removal of the standard metrics, given the number of implemented activities in SDHC's MTW Plan. The number of hours also does not include the time it takes to complete the required public comment process for the MTW Plan. Removing the standard metrics and including an option to include narrative, participant success stories, and PHA reported data will significantly minimize the burden of the collection of information on MTW agencies. Continuing to allow for electronic submission of MTW Annual Plans and Reports will also continue to minimize administrative burden.	HUD believes if a PHA is completing purely the required information on the Form that on average 66 hours is adequate. While past significant revisions to the Form have created additional work for PHAs as they have transitioned to revised format, these 2024 revisions to the Form are not significant and should still result in a lower overall burden. HUD does understand that many MTW Agencies use the Annual MTW Plan and Annual MTW Report as more than a reporting tool to HUD. In many communities, these documents provide broader and more detailed information than is required in the Form, in order to communicate with local stakeholders regarding the overall programs and operations of the PHA. However, this is not required and is done at the discretion of each PHA.

Housing Authority of the County of San Bernardino (HACSB)	<p>HACSB welcomes the flexibility to use local metrics and other methods to measure active MTW activities as they may demonstrate more accurate outcomes of the activity, as some of the current standard metrics do not capture the true outcome of the activity. For HUD’s proposed process of in lieu of agency-reported standard metrics, HUD will pull data already reported by the agencies through required HUD systems (such as the 50058), HACSB has concerns as to how and what data would be pulled to derive MTW activity outcomes. Many of the initial 39 MTW PHAs have unique initiatives of which the concern is of how outcomes would be accurately reported through a HUD electronic system. Also, would these outcomes be published for public access and if the MTW PHA has a question of the outcomes will there be a discrepancy resolution process to address those concerns? Lastly, for outcomes derived from HUD electronic systems, how will HUD distinguish customers participating in the various activities?</p>	<p>Thank you for the comment .HUD will continue to work in tandem with the MTW Collaborative to develop alternative MTW activity outcomes that can support the 3 MTW Statutory Objectives using systems data and to provide outcomes on a more macro level. The outcomes will be publicly available on HUD’s MTW website in a database format where public users can pull outcomes by PHA. HUD will continue to work with the MTW Collaborative to determine specifications of this database as they have yet to be fully determined. Various stakeholders have agreed that due to the granularity and complexity of specific MTW activities, reporting on outcomes at an activity level may not be adequately showcasing overall outcomes that an MTW PHA may be achieving with a variety of initiatives. MTW PHAs may still choose to report on individual activities using the old metrics or its own agency metrics, but it is no longer required.</p>
Housing Authority of the County of San Bernardino (HACSB)	<p>HACSB does not believe the notice’s accuracy of the agency’s estimate of burden of 66 hours for the proposed collection of information of the Annual MTW Plan and MTW Report combined is accurate. In the event the standard metrics are eliminated, it is anticipated the administrative burden of the Annual MTW Plan and Annual MTW Report will still far exceed 66 hours. Both the Plan and Report are multi month projects that is coordinated by a full-time analyst and supported by many staff. For the Report, for two metrics, HACSB conducts a time-study to measure staff time savings for eight of our activities, for this process only, at a minimum, account for approximately 20 hours, from organizing the time study, staff participating in the study, data collection, analysis, and summary of the data</p>	<p>HUD believes if a PHA is completing purely the required information on the Form that on average 66 hours is adequate. While past significant revisions to the Form have created additional work for PHAs as they have transitioned to revised format, these 2024 revisions to the Form are not significant and should still result in a lower. HUD does understand that many MTW Agencies use the Annual MTW Plan and Annual MTW Report as more than a reporting tool to HUD. In many communities, these documents provide broader and more detailed information than is required in the Form, in order to communicate with local stakeholders regarding the overall programs and operations of the PHA. However, this is not required and is done at the discretion of each PHA.</p>
Housing Authority of the County of San Bernardino (HACSB)	<p>More information is needed to be able to weigh in how the quality, utility, and clarity of the proposed revisions to form 50900 will be collected. Allow MTW PHAs to determine the best way to report on their approved activities</p>	<p>We will continue to work with the MTW Collaborative in determining alternative outcome measures that can be meaningful while minimizing burden.</p>

San Diego Housing Commission (SDHC)	Eliminate reporting on elements in Section II: General Operating Information of form 50900 of the MTW Report for information on Actual Households Served and Comparable Mix as this information can and is being derived from other in-place HUD reporting systems.	Thank you for the comment. Once the Housing Information Portal (HIP) is up and running, HUD will determine whether this information can be collected through it. However, local, non-traditional household data will not be reported in HIP by initial MTW PHAs and must be collected in Form HUD 50900”.
Home Forward (Portland)	From an evaluation standpoint, eliminating previously required standard metrics and giving MTW PHAs the option to share self-reported data may complicate HUD’s ability to analyze standard metrics across the MTW PHAs. Given that MTW provides the opportunity to design and test innovative strategies, it is important that evaluation is ongoing. Even amongst the initial 39 agencies, self-reported data likely varies greatly. HUD’s ability to assess which MTW strategies are resulting in successful outcomes and scale those policy interventions to other PHAs across the country is central to the program’s impact.	Thank you for your comment. The decision to remove previously required standard metrics was made in collaboration with the MTW Collaborative and was based on feedback we have received from HUD's Office of Policy Development and Research and other stakeholders, with concerns on verifiability and lack of consistency in the data being reported, and the challenges with reporting on metrics at the specific MTW activity level (overall outcomes may be attributed to a variety of MTW PHA initiatives).
Home Forward (Portland)	While we support the principle of simplifying and streamlining reporting, without some specifics as to which system(s) HUD will use for the various metrics, the Proposal raises serious concerns about how HUD will utilize and aggregate the already reported data. For instance, HUD could elect to calculate its Substantially the Same Assessment using HUD data pulls rather than relying on self-reported agency data. For Home Forward, this would result in a gross misrepresentation of our agency’s true impact. If HUD were to conduct this assessment based solely on data already available via existing HUD systems, this critical MTW requirement that we serve substantially the same number of households would exclude a number of households we serve via local programs enabled by our MTW flexibilities that are not reported in any existing HUD systems. This is just one example of the risks of HUD relying on already reported data.	Thank you for your comment. There is no plan to use this data for STS or any other means of assessing or comparing agencies. The goal is to report out on outcomes as they relate to the 3 MTW Statutory objectives. The development of the database will be done transparently in collaboration with the MTW Collaborative and other stakeholders.

Home Forward (Portland)	<p>The current Proposal lacks specifics on how HUD will revise the form or which HUD systems it intends to pull already reported data from. The vagueness of this change is concerning; the impacted agencies, residents, and the public must be provided an opportunity to review the specific proposed changes to Form 50900 before it is approved...The Annual MTW Plan and Report are important tools to inform HUD, residents, and the public of progress towards our mission. While certain elements of the existing Form 50900 are burdensome for PHAs to report on, consistency to reporting is critical for HUD to analyze and understand what is working – and what isn’t – for MTW agencies...One of the more concerning aspects of the Proposal’s lack of specifics is that HUD will pull data already reported by MTW PHAs through required HUD systems. It is unclear which HUD systems are available to report the amount of data the MTW PHAs report on in the MTW Report. Many of these metrics aren’t data that can be gathered on existing HUD systems such as FDS, PIC, or VMS. Further, some activities that Home Forward reports on are almost entirely dependent on external systems that HUD does not have access to.</p>	<p>Thank you for your comment HUD will continue to work in tandem with the MTW Collaborative to develop alternative MTW activity outcomes that can support the 3 MTW Statutory Objectives using systems data and to provide outcomes on a more macro level. The outcomes will be publicly available on HUD’s MTW website in a database format where public users can pull outcomes by PHA. HUD will continue to work with the MTW Collaborative to determine specifications of this database as they have yet to be fully determined. Various stakeholders have agreed that due to the granularity and complexity of specific MTW activities, reporting on outcomes at an activity level may not be adequately showcasing overall outcomes that an MTW PHA may be achieving with a variety of initiatives. MTW PHAs may still choose to report on individual activities using the old metrics or its own agency metrics, but it is no longer required.</p>
Vancouver Housing Authority (VHA)	<p>We support the removal of required metrics in the Annual Report. The required metrics do not always represent the impact of activities. Particularly relating to financial metrics: baselines remain the same, but over time costs increase and measurements against the baseline become meaningless.</p>	<p>Thank you for your comments and general support for removing the standard metrics and providing narrative options to MTW PHAs. We will continue to work with the MTW Collaborative in determining alternative outcome measures that can be meaningful while minimizing burden.</p>

Vancouver Housing Authority (VHA)	This is an underestimate, the collection of information is more costly because typically there are Plan Amendments that have to take place (just given the nature of how plans change over time), which aren't accounted for here; in addition, since we collect information from various parties and then need layers of approval and review, it takes substantially longer than 33 hours per Report or Plan when all contributors' time and costs are taken into consideration.	Thank you for your comment. HUD believes if a PHA is completing purely the required information on the Form that on average 66 hours is adequate. While past significant revisions to the Form have created additional work for PHAs as they have transitioned to revised format, these 2024 revisions to the Form are not significant and should still result in a lower overall burden. HUD does understand that many MTW Agencies use the Annual MTW Plan and Annual MTW Report as more than a reporting tool to HUD. In many communities, these documents provide broader and more detailed information than is required in the Form, in order to communicate with local stakeholders regarding the overall programs and operations of the PHA. However, this is not required and is done at the discretion of each PHA.
Vancouver Housing Authority (VHA)	Streamline as you're already intending to do, and allow for electronic submission when at all feasible. Consider a template that has fillable tables so we're not designing and adjusting custom formatting if not absolutely necessary (ie design a template that is not a PDF with model tables, but one with adaptable tables and narrative sections that can be completed in the PDF proper)- this will allow for more consistency across MTW Agencies, too.	Thank you for the comment. HUD is moving to an online collection template for the PHA Plan and we will explore whether this is feasible for the MTW Plan and Report. We have heard from other MTW PHAs that a fillable PDF would not work for them given the many unique aspects of MTW programs at the 39 MTW PHAs.
Seattle Housing Authority (SHA)	Removal of MTW Plan Section IV(A)(iv) Planned changes to metrics/data collection / MTW Report Sections IV(A)(iv) Actual changes to metrics/data collection and IV(A)(vi) Challenges in achieving benchmarks and possible strategies and all other references to the Standard HUD metrics in the Form 50900	Thank you for your comments and general support for removing the standard metrics and providing narrative options to MTW PHAs. We will continue to work with the MTW Collaborative in determining alternative outcome measures that can be meaningful while minimizing burden.

Seattle Housing Authority (SHA)	<p>MTW Plan Section II(A)(i) Planned new public housing units: HUD requires MTW PHAs to submit a table containing all new public housing units anticipated in the coming fiscal year in each MTW Plan, including a breakdown by unit size. The bedroom size categories provided are different in the MTW Plan than in other reporting requirements to HUD; the Form 50900 currently combines the count of 0 and 1 bedroom units. The bedroom size categories should be updated to match the data fields in the PIH Information Center (PIC) as follows: 0 bedroom, 1 bedroom, 2 bedrooms, 3 bedrooms, 4 bedrooms, 5+ bedrooms.</p>	<p>Thank you for the comment. A separate 0 bedroom column has been added in MTW Plan Section II(A)(i) Planned new public housing units in the Annual MTW Plan, and the bedroom size categories now match data fields in PIC.</p>
Seattle Housing Authority (SHA)	<p>Together with the other MTW agencies and stakeholders who participated in the small working group on the standard HUD metrics, SHA extends our sincerest gratitude to HUD for granting the opportunity to collaborate on the revisions to the Form 50900 which resulted in the removal of the standard HUD metrics as a reporting requirement. We are hopeful that this collaborative approach will continue to be utilized in the future, as is being seen in the development of new measures for evaluation and measurement of the successes of the initial 39 MTW agencies. HUD's partnership is instrumental in advancing our collective efforts towards having positive and meaningful impact on the households that we serve, and we continue to welcome conversations like those that led to these revisions.</p>	<p>Thank you for your comments and general support for removing the standard metrics and providing narrative options to MTW PHAs. We will continue to work with the MTW Collaborative in determining alternative outcome measures that can be meaningful while minimizing burden.</p>
Seattle Housing Authority (SHA)	<p>MTW Plan Section II(A)(vi) General description of all planned capital expenditures during the plan year / MTW Report Section II(A)(iv) General description of all actual capital expenditures during the plan year: HUD has added language to the instructions of this section as well, specifically to "[i]nclude details regarding any expenditures to make units or developments UFAS/504/ADA compliant." As with the previous section on planned changes to housing stock, the 50900 is not the mechanism through which HUD should be confirming SHA's compliance with accessibility requirements.</p>	<p>Thank you for the comment. After reviewing this comment and discussing it internally, this added language will be removed in the updated Form 50900.</p>

<p>Seattle Housing Authority (SHA)</p>	<p>MTW Plan Section II(B)(i) Planned number of households served / MTW Report Section II(B)(i) Actual number of households served: The Form 50900 requires the MTW PHAs to report on households served by totaling the number of unit months and dividing that number by twelve. Calculating households served by this method is misleading and often undercounts the number of households truly served by each PHA annually. This is particularly true for programs such as short-term rental assistance programs, rapid rehousing and those designed to end homelessness, which often intentionally serve more than one unique household per “unit” per year. We encourage HUD to update this section to reflect unit months per HUD’s definition in addition to households served per the PHA’s calculation, such as unique households served.</p>	<p>Thank you for the comment. In MTW Plan Section II(B)(i) Planned number of households served in both the Annual MTW Plan and Annual MTW Report, an optional description table will be added to track unique households served.</p>
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<p>Seattle Housing Authority (SHA)</p>	<p>MTW Plan Section III(D)(ii) Hardship case criteria: The instructions for this section state that “[a]ny MTW activity that...alters the rent calculation” requires a hardship policy, and that all hardship policies must define “the circumstances under which households may be exempted or provided temporary relief from the policy.” We believe that any rent reform activities which benefit the household (e.g., reduce the amount of rent owed or tenant portion of rent) should be exempted from this requirement.</p> <p>In addition, this section requires that a copy of the hardship policy associated with any proposed new rent reform/term limit activity be included in an appendix. HUD also indicates that this is to be used for the express purpose of the public review/comment process and will not be used in HUD’s review of the activity itself. We do not think this is a necessary or appropriate requirement. There are existing regulations as well as local accountability standards that housing authorities follow for transparency and when engaging with residents and the community when proposing to adopt or amend policies. It is not HUD’s place to dictate the details of these processes. For these reasons, we think that this requirement is inappropriate and should also be removed.</p>	<p>Thank you for the comment. MTW flexibilities that result in a change to the amount a household must pay towards their housing assistance and/or limit the amount of time that a household is able to receive housing assistance have a large impact on those households. These MTW flexibilities are proposed by the PHA and approved by HUD through the MTW Plan. It is therefore necessary and appropriate that the PHA provide details on hardship criteria for these impactful activities as a part of the MTW Plan approval process.</p>
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<p>Seattle Housing Authority (SHA)</p>	<p>MTW Plan Section IV(A)(v) Planned significant changes / MTW Report Section IV(A)(v) Actual significant changes: This version of the 50900 still requires PHAs to re-propose activities if “significant changes” are anticipated in the Plan year. This concept of re-proposal is antithetical to the very purpose of MTW. Attachment C of the Standard Agreement states “The purpose of the Statement of Authorizations is to delegate to the Agency the authority to pursue locally driven policies, procedures and programs...” It is not HUD’s role to approve our specific policies but to authorize use of MTW flexibilities. SHA and our MTW peers have rightfully been objecting for years to HUD’s excessively broad criteria for what constitutes a significant change. A significant change is loosely defined in the proposed 50900, in part, as a change which “fundamentally changes the nature and scope of an activity to the extent that there is the potential for a different impact on residents.” “Different impact” is not a reasonable threshold for “fundamentally changing the nature and scope of an activity” or of a “significant change.” Similarly, a PHA could even be making a change that is to residents’ benefit and this threshold would still require a re-proposal.</p> <p>Additionally, HUD’s only criteria to be able to reject an MTW activity is if it is not waivable under Attachments C and D. HUD’s other standard for a “significant changes to activities” is if “an additional MTW authorization is needed.” If HUD’s only ability to reject an activity is that the scope or nature of the activity is not waivable under the Standard Agreement, then there is no reason to re-propose an activity which is already allowable. Surely there is another method for HUD to consider the addition of an MTW authorization without having to re-propose the entire activity. We once again strongly encourage HUD to remove/revise this section to be consistent with the purpose of MTW.</p>	<p>Thank you for the comment. MTW activities must be re-proposed when the nature of the activity has changed such that an additional MTW authorization is needed or when an MTW PHA fundamentally changes the nature and scope of an activity to the extent that there is the potential for a different impact on residents. Making such significant changes is akin to the proposal of a new activity, which is why the re-proposal is required</p>
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Seattle Housing Authority (SHA)	MTW Report Section IV(A)(ii) Description/impact/update: The instructions in the 50900 require that MTW PHAs report “the number and results of any hardship requests” in the MTW Report for any rent reform/term limit activities. This information is already provided to HUD via alternative means annually. Beyond being duplicative, the MTW Report is not an appropriate location to provide this type of compliance information and the requirement should be removed.	Thank you for the comment. MTW flexibilities that result in a change to the amount a household must pay towards their housing assistance and/or limit the amount of time that a household is able to receive housing assistance have a large impact on those households. These MTW flexibilities are approved through the MTW Plan and then followed annually through the MTW Report. Information on the number and result of hardship requests is important in assessing the impact of these MTW flexibilities. It is therefore necessary and appropriate that the PHA provide details on the number and results of hardship requests as a part of the MTW Report
MTW Collaborative	The MTW Collaborative supports removing the Standard Metrics from the Form 50900. As noted in previous public comments and in ongoing discussions with HUD, the Standard Metrics proved to be of limited utility as a tool to evaluate MTW performance and outcomes. In lieu of the Standard Metrics, we ask that HUD continue working with MTW agencies and the MTW Collaborative on a mutually agreed upon set of alternative performance measures that allow agencies to communicate meaningful information about MTW agency activities and outcomes to their local communities, HUD, and other external stakeholders.	Thank you for your comments and general support for removing the standard metrics and providing narrative options to MTW PHAs. We will continue to work with the MTW Collaborative in determining alternative outcome measures that can be meaningful while minimizing burden
MTW Collaborative	Added Sections on Narrative Self-Reported Data and Participant Impact Stories The MTW Collaborative has no objections to the addition of these optional sections to the Form 50900.	Thank you for your comments.
MTW Collaborative	Item 6 HUD proposes adding the following language: “....including any applicable fair housing plan for the MTW PHA’s jurisdiction and a description of the manner in which the MTW PHA Plan is consistent with the applicable Consolidated Plan. 24 CFR §§ 91.2, 91.225, 91.325, and 91.425.” We request that HUD supply guidance to the state and local officials on the requirements for applicable fair housing plans, so that these entities can appropriately provide the requested certification and thereby reduce potential exposure to PHAs.	Thank you for your comment. This issue has been flagged to various HUD offices and is still under review internally. This will likely not be resolved prior to the publication of the upcoming 30 day PRA Notice. We will inform you when we have updates to provide and it will be before any final publication.

MTW Collaborative	<p>Item 7 We request that the following sentence be deleted: “The MTW PHA certifies that it will take no action that is materially inconsistent with its obligation to affirmatively further fair housing.” If HUD is unwilling to delete that sentence in its entirety, we would then request it be revised to the following: “The MTW PHA will not knowingly take any action that the MTW PHA has determined to be materially inconsistent with its obligation to affirmatively further fair housing.” The certification language as currently written unnecessarily exposes agencies to False Claims Act violations, especially given that Affirmative Further Fair Housing (“AFFH”) actions vary by community and reasonable individuals could disagree as to whether a particular action is considered “materially inconsistent” with AFFH.</p>	<p>Thank you for your comment. This issue has been flagged to various HUD offices and is still under review internally. This will likely not be resolved prior to the publication of the upcoming 30 day PRA Notice. We will inform you when we have updates to provide and it will be before any final publication.</p>
King County Housing Authority (KCHA)	<p>The existing Form 50900 requires MTW agencies to select standard metrics for approved activities, identify a benchmark and track changes against a baseline. As currently utilized, the standard metrics often fall short of accurately portraying the full impact of an activity. In some cases, the metrics are not meaningful to internal staff or external partners. KCHA generally supports the elimination of the standard metrics and appreciates the option to provide self reported PHA data alongside voluntary qualitative narratives. The proposed modifications better align with MTW flexibilities, and will allow agencies to tell their MTW story in a more meaningful way.</p>	<p>Thank you for your comments and general support for removing the standard metrics and providing narrative options to MTW PHAs.</p>
King County Housing Authority (KCHA)	<p>We encourage continued cooperation and discussion to determine appropriate and mutually beneficial data and metrics that can be pulled through required HUD systems or reported by MTW agencies. Data without context and input from MTW agencies will not be demonstrative of MTW activity-based outcomes, especially without historical data to truly track changes.</p>	<p>We will continue to work with the MTW Collaborative in determining alternative outcome measures that can be meaningful while minimizing burden.</p>

King County Housing Authority (KCHA)	KCHA also endorses the comments submitted by the Moving to Work Collaborative, and we wish to specifically support and reiterate their concerns regarding the proposed changes to the Certifications of Compliance. The Certification of Compliance is legally binding and false statements are subject to criminal and/or civil penalties. Given the variance in AFFH actions taken by jurisdictions around the country, and the likelihood that reasonable individuals could disagree as to whether a particular action is in compliance with an AFFH goal, we strongly urge HUD to make changes to the proposed language in section 6 and 7 of the proposed Certifications of Compliance.	Thank you for your comment. This issue has been flagged to various HUD offices and is still under review internally. This will likely not be resolved prior to the publication of the upcoming 30 day PRA Notice. We will inform you when we have updates to provide and it will be before any final publication
Tacoma Housing Authority (THA)	THA supports the recommendations of the MTW Collaborative and is in agreement that HUD continue working with MTW agencies and the MTW Collaborative on a mutually agreed upon set of alternative performance metrics to communicate the efficacy of the MTW demonstration; THA appreciates the opportunity to submit public comment and is eager to continue participating in these discussions with HUD and the MTW Collaborative to streamline reporting.	Thank you for your comments and general support for removing the standard metrics and providing narrative options to MTW PHAs. We will continue to work with the MTW Collaborative in determining alternative outcome measures that can be meaningful while minimizing burden.
Tacoma Housing Authority (THA)	With regard to the accuracy of the agency's estimate of the burden of the proposed collection of information, THA believes 33 hours per plan or report per year is a significant underestimate of the time required to complete the HUD Form 50900 requirements. THA believes this time could easily be tripled for the MTW plan, taking into the consideration the collective staff time for developing and updating MTW activities and submitting the corresponding impact analyses, and taking time for meaningful stakeholder engagement which includes staff feedback and public comment. Likewise, for the MTW report, THA believes the time estimate of 33 hours can be doubled, taking into consideration the ad hoc methods to measure and report data for the standard metrics.	Thank you for your comment. HUD believes if a PHA is completing purely the required information on the Form that on average 66 hours is adequate. While past significant revisions to the Form have created additional work for PHAs as they have transitioned to revised format, these 2024 revisions to the Form are not significant and should still result in a lower overall burden. HUD does understand that many MTW Agencies use the Annual MTW Plan and Annual MTW Report as more than a reporting tool to HUD. In many communities, these documents provide broader and more detailed information than is required in the Form, in order to communicate with local stakeholders regarding the overall programs and operations of the PHA. However, this is not required and is done at the discretion of each PHA