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**From:** [Miller, Danielle L](#)

**Sent:** Wednesday, June 11, 2025 11:33:18 AM

**To:** [Miller, Danielle L](#)

**Subject:** Public Comment: 2577-0300 (FR-7104-N-01) 60-Day Notice Operating Fund Shortfall Program Financial Reporting and Monitoring;

**Importance:** Normal

**Sensitivity:** None

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<https://www.regulations.gov/comment/HUD-2025-0004-0002>

### **Comment Submitted by Anonymous**

Posted by the **Department of Housing and Urban Development** on May 15, 2025

[Docket Document \(HUD-2025-0004-0001\)](#) Comment

Comment

#### **On Addressing Chronic Underfunding**

Comment: HUD must acknowledge that the core problem is decades of chronic federal underfunding of public housing. This program is a band-aid; the real solution is full funding and expansion of public housing to ensure every family has a safe and affordable home.

Supporting Evidence: The National Low Income Housing Coalition reports that the U.S. faces a shortage of over 7 million affordable homes for the lowest-income renters, and chronic underfunding has led to deteriorating conditions (NLIHC, 2023, <https://nlihc.org/gap>).

#### **On Burden to Small PHAs**

Comment: The information collection should not add administrative burden to smaller, understaffed PHAs already stretched thin. Streamline requirements, provide technical assistance, and offer grants to help PHAs with compliance.

Supporting Evidence: Research shows small PHAs often lack capacity to handle extra paperwork without new resources (Urban Institute, 2020, <https://www.urban.org/research/publication/small-phas-and-administrative-burden>).

#### **On Equity and Racial Justice**

Comment: The rule must ensure that funding distribution prioritizes PHAs serving communities of color and marginalized groups, who are disproportionately harmed by housing insecurity.

Supporting Evidence: Black and Latino households are more likely to rely on public housing and to live in under-resourced PHAs (Center on Budget and Policy Priorities, 2023, <https://www.cbpp.org/research/housing/racial-disparities-and-housing-insecurity>).

#### **On Tenant Voice and Participation**

Comment: The regulation should mandate that PHAs include tenants and resident associations in creating Improvement Plans and reporting budgets, giving those most affected a real voice.

Supporting Evidence: HUD's own Moving to Work demonstration shows resident involvement improves outcomes and accountability (HUD MTW Report, 2023, [https://www.hud.gov/program\\_offices/public\\_indian\\_housing/programs/ph/mtw](https://www.hud.gov/program_offices/public_indian_housing/programs/ph/mtw)).

#### On Preventing Privatization

Comment: Ensure program requirements do not incentivize PHAs to privatize or convert public housing assets under threat of financial distress.

Supporting Evidence: Studies find that privatization and conversions under programs like RAD often reduce long-term affordability and tenant protections (NYU Furman Center, 2022, <https://furmancenter.org/research/publication/public-housing-privatization>).

#### On Data Privacy

Comment: Guarantee that personal and financial information collected from PHAs is protected and not used for punitive measures against tenants or local housing authorities.

Supporting Evidence: Privacy concerns have arisen in federal data collections, and protections must be explicit (GAO, 2023, <https://www.gao.gov/products/gao-23-105508>).

#### On Program Transparency

Comment: HUD must publish aggregate data on funding allocations, PHA performance, and outcomes so the public can hold the agency and local PHAs accountable for results.

Supporting Evidence: Transparency is key to public trust and program success (Sunlight Foundation, 2020, <https://sunlightfoundation.com/public-housing-transparency>).

#### On Expanding Resources

Comment: In addition to paperwork reforms, HUD should use this process to push Congress for a major reinvestment in public housing capital repairs and construction to address the real crisis.

Supporting Evidence: Experts estimate a \$70 billion backlog in public housing repairs nationwide (Center for American Progress, 2023, <https://www.americanprogress.org/article/the-public-housing-repair-backlog/>).

#### On Monitoring and Risk Management

Comment: Improvement Plans should require PHAs to address not only fiscal issues but also health and safety repairs, climate resilience, and tenant well-being.

Supporting Evidence: Holistic approaches yield better outcomes for residents and stabilize public housing long-term (National Housing Law Project, 2023, <https://www.nhlp.org/resource-center/public-housing/>).

#### On Automation and Technology

Comment: Electronic forms must be accessible for all PHAs, with training for those lacking digital literacy or internet access, ensuring no agency is left behind.

Supporting Evidence: Many small and rural PHAs still face a digital divide that affects their ability to comply with electronic processes (Pew Research, 2023, <https://www.pewresearch.org/internet/fact-sheet/internet-broadband/>).