



February 12, 2026

Mr. Ben Hobbs
Assistant Secretary
Office of Public and Indian Housing
U.S. Department of Housing and Urban Development
451 Seventh Street SW
Washington, DC 20410

RE: Recent IT Working Group Meeting and Proposed Alternative Software and HOTMA Deployment

Dear Mr. Hobbs,

On behalf of the IT Working Group, we thank you for the recent opportunity to learn more about what HUD is planning from a technology perspective as it pertains to the Housing Information Portal (HIP), the IMS-PIC system, and HOTMA. As a follow-up, we would like to make an alternative suggestion for HOTMA deployment.

To summarize our feedback:

- HUD should prioritize modifications to PIC that allow PHAs to submit HOTMA-compliant 50058s using the 2024 form in JSON file format and not move forward with interim steps to accommodate the ASCII file format.
- Working with software vendors and the PHA industry groups, HUD should commit to a feasible timeline for rollout with tangible deliverables. Any missed deadlines would result in delays to subsequent milestones. We have proposed a high-level timeline in this letter.
- HUD should not announce any new HOTMA compliance date until the Department and software vendors are confident that they can be ready for that date. PHAs have already spent considerable funds on HOTMA training only for deadlines to be postponed.
- Following deployment of software vendors' final builds—which we anticipate could be completed as early as end of September—PHAs should have at least six months of User Acceptance Testing (UAT) to train staff and ensure the system is ready.

Background:

The Council of Large Public Housing Authorities (CLPHA), the Moving to Work Collaborative (MTW Collaborative), the National Association of Housing and Redevelopment Officials (NAHRO), and the Public Housing Authorities Directors Association (PHADA) represent almost all the 3,300+ public housing authorities (PHAs) in the United States. Our members work every day to house vulnerable individuals and families in communities throughout our nation while also maximizing the impact of federal funding and ensuring that taxpayer dollars are spent in compliance with all statutes and regulations.

The IT Working Group comprises over 100 experts including PHA IT staff, software vendors, and industry organization staff. It was formed to serve as a forum for the industry and key partners to work collaboratively with HUD on major IT projects such as this.

Proposed Deployment Timeline:

We write to suggest an alternative deployment timeline whereby all PHAs would **fully implement HOTMA for any 50058s with an effective date on or after April 1, 2027, using the 2024 JSON file format.**

We would prefer to avoid the distractions that are inherent with interim changes to accommodate the existing ASCII file format. Each iteration of file format changes will require a full development cycle, which takes a minimum of 6 months. Software vendors part of the IT Working Group have expressed preference to focus their resources on the future state and avoid anything that will cause further delays and create confusion for PHAs.

Therefore, we strongly urge HUD to prioritize development of the 2024 version of the 50058 form that would be accepted by PIC in JSON format. If HUD can meet these timelines, we anticipate that software vendors, industry groups, and PHAs can meet them as well. We recommend this high-level timeline:

- March 1, 2026 – HUD delivers full Technical Reference Guide for 2024, including 50058 report format changes, Software vendors begin code merge/development
- April 1, 2026 – HUD provides a testing environment for file submission.
- April 1, 2026 – August 1, 2026 – Software vendors create technical documentation and perform internal training for software support.
- April 1, 2026 – October 1, 2026 – Software vendors test with HUD in test environment.
- April 1, 2026 – October 1, 2026 – Revisions to software based on testing and feedback from HUD.

- August 1, 2026 – September 1, 2026 – Environment configuration and beta training for beta agencies by software vendors.
- September 1, 2026 – HUD issues PIH Notice/policy documentation for the industry with specific guidance about the expected changes.
- September 1, 2026 – January 1, 2027 – Beta testing with small group of PHAs in collaboration with HUD.
- September 1, 2026 – January 1, 2027 – Admin/ACOP updates, policy guidance by NAHRO, PHADA, CLPHA, MTW Collaborative, industry training by industry group, consultants, etc.
- September 15, 2026 – Development cut-off, security testing, final builds, release notes, etc. for development.
- September 15, 2026 – October 1, 2026 – Deployment planning, version publishing, and installation/required configuration training for client services staff.
- October 1, 2026 – January 1, 2027 – Software vendors deploy HOTMA changes and provide software training to PHAs.
- October 1, 2026 – January 1, 2027 – PHAs test policy and software changes in a test environment.
- January 1, 2027 (**at the earliest**) – Agencies begin creating HOTMA-compliant 50058s with effective dates of April 1, 2027.
- April 1, 2027 (**at the earliest**) – HUD begins accepting 2024 JSON files for all agencies.

It is imperative that this schedule be adjusted appropriately if milestones are missed. For that reason, we are requesting that HUD not announce the new HOTMA compliance date until final quarter of the year so that the Department and software vendors can ensure that development and alpha testing go smoothly before PHAs invest their scarce resources into staff training.

Need for Adjusted Timeline:

A prerequisite for meeting this timeline is HUD providing the full Technical Reference Guide (TRG) for 2024 to software vendors. No software vendors can complete their programming for HOTMA without a complete TRG that includes information on the new, HOTMA-compliant versions of forms. Additionally, many smaller software vendors have elected to delay starting this programming to save costs by avoiding potential revisions. Vendors need HUD to provide a complete, validated Technical Reference Guide to program their software and test it thoroughly to ensure there are no issues.

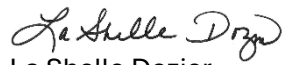
Following deployment of vendors' final builds, at least six months of User Acceptance Testing (UAT) will ensure that the system is ready before the Department begins migrating over 3,300 PHAs to the new form. PHA staff will need ample time to be trained on the new systems, and adopting this timeline will allow PHAs to target their limited resources to retraining staff and to address other Departmental regulations that must be implemented in 2026. The six-month UAT period will also provide ample time for PHAs, vendors, and HUD to troubleshoot any problems with the system that arise after nationwide adoption.

We will also need to have at least monthly meetings with both technical and policy resources at HUD to answer questions. Any delays, especially in terms of technical specifications and a testing environment, would delay the rest of the deployment.

Additionally, we request a meeting to discuss Moving to Work Expansion since there are some technical challenges inherent with not deploying the 2020 file format. We have ideas to help overcome these challenges.

We are very excited to move forward in collaboration with the Department and hope HUD will consider this alternative plan to give the industry and software vendors an opportunity to properly train and prepare the PHAs to meet HUD's regulatory goals.

Sincerely,


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