

Public Comment on HUD's Proposed Information Collection Renewal: Housing Opportunity Through Modernization Act of 2016 (HOTMA): Public Housing Waiting List Data Collection Tool.

I submit this comment in response to HUD's September 15, 2025 notice seeking public input on the renewal of the *Public Housing Waiting List Data Collection Tool* under the Paperwork Reduction Act. As a law student who is focused on affordable housing and fair housing enforcement, I have examined how data accuracy and consistent reporting influence the allocation of housing resources nationwide. My perspective is shaped by my work with regional housing agencies and nonprofit advocates who depend on HUD's public housing data to identify systemic inequities.

Section 103 of the *Housing Opportunity Through Modernization Act of 2016 (HOTMA)* requires public housing agencies (PHAs) to report annually on both (1) over-income families residing in public housing after a two year grace period and (2) the number families on the public housing waiting list. HUD proposes to continue the use of the electronic Public Housing Waiting List Data Collection Tool for these submissions. According to the notice, HUD estimates that each PHA will spend roughly 30 minutes per year entering data, with a total burden of 1,341 hours across 2,681 respondents.

While the proposed collection is necessary and valuable, several practical and equity-based concerns arise. First, HUD's estimated 30 minute average per PHA entry may not reflect the operational diversity across housing authorities. Small PHAs with limited administrative staff often manage waiting lists using outdated systems or even manual records. For these agencies, consolidating, cleaning, and uploading accurate data may require significantly more time. Therefore, HUD should consider conducting a stratified sample survey across small, medium,

and large PHAs to evaluate actual staff time and resource costs needed to complete the submission. Second, while HUD's plan to publish annual summary data is commendable, equity-focused reporting would benefit greatly from disaggregated data—including breakdowns by region, race, ethnicity, disability status, age, and family composition—to better illuminate access barriers faced by marginalized groups. These data points are essential to determining whether waiting list procedures or over-income occupancy policies disproportionately affect certain communities, particularly Black, Latino, Indigenous, and disabled households that historically experience longer waiting times and higher denial rates.

Finally, because Section 103 of HOTMA interacts with broader fair housing enforcement and mobility policy, HUD could use this collection as a foundation for a more comprehensive national transparency initiative. Publishing public dashboards with anonymized, geographically disaggregated waiting list data which is similar to HUD's Picture of Subsidized Households tool would allow researchers, advocates, and policymakers to track regional disparities and evaluate whether PHAs are equitably serving very low-income families.

All in all, the *Public Housing Waiting List Data Collection Tool* is a vital instrument for accountability under HOTMA, but its utility depends on robust, consistent, and inclusive data. By refining burden estimates, disaggregating data, and supporting smaller PHAs, HUD can ensure that this collection truly advances the goals of transparency, equity, and efficiency in the administration of public housing. Thank you for the opportunity to comment. I appreciate HUD's commitment to public engagement and look forward to future transparency in housing policy data collection.

Respectfully submitted,

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