



PRINCIPAL DEPUTY ASSISTANT SECRETARY  
FOR PUBLIC AND INDIAN HOUSING

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT  
WASHINGTON, DC 20410-5000

August 14, 2025

Ms. Jennifer L. Hall  
Executive Director  
Ann Arbor Housing Commission  
727 Miller Ave.  
Ann Arbor, MI 48103-3367

Dear Ms. Hall:

The U.S. Department of Housing and Urban Development (HUD) reviewed the Ann Arbor Housing Commission's (AAHC) waiver request submitted pursuant to a notice titled, "Guidance on Transitioning EHV Families into HCV and End of EHV Services Fee Expenditure" (Notice PIH 2025-19). The Notice provides instructions for a streamlined submission and review process for a regulatory waiver that, if approved, would permit the public housing agency (PHA) to place all Emergency Housing Voucher (EHV) families on its Housing Choice Voucher (HCV) waiting list with the appropriate preference.

For all requested waivers, the PHA must describe a PHA-specific justification that shows good cause for the waiver request. The good cause justification must include a) why the PHA needs the waiver, and b) the impact on the PHA operations and applicants if the waiver is not provided. AAHC's application was submitted by an authorized official and includes AAHC's justification for the waiver to be granted. AAHC's justification for the waiver is as follows:

- Incorporating EHV participants under our standard waiting-list procedures would trigger a significant administrative burden and delay the ability to transition EHV families to HCV. EHV families would face 8–12-week delays before they appear on our HCV waiting list. Households nearing lease deadlines could incur housing instability if they cannot access the HCV program seamlessly, potentially resulting in emergency shelter stays or return to homelessness. Further, a significant share of EHV families face barriers to completing a multi-step application process, such as limited literacy or lack of reliable internet access. If EHV families are required to follow the standard waiting-list procedures, several families will see their Housing Assistance Payments (HAP) contracts halted and leases jeopardized. Many will cycle into emergency shelter or face eviction before they ever get on the HCV waiting list. Additionally, AAHC staff would be forced to spend time tracking down non-responsive families and fielding landlord inquiries, which would divert resources from critical housing search assistance, inspections scheduling, and supportive services—further slowing the transition process.

The regulation at 24 CFR 982.204 is premised on the notion that families must submit an application to be placed on the waiting list. The regulation at 24 CFR 982.206 requires that the


PHA provide public notice of the opening of the waiting list. After reviewing the waiver request and considering AAHC's stated justification of good cause as described above, the Department finds there is a good cause to waive, and hereby waives, the requirement at 24 CFR 982.204, as necessary, to allow AAHC to place all EHV families on its waiting list without requiring them to submit individual applications. HUD also finds good cause to waive, and hereby waives, the requirement at 24 CFR 982.206, to allow EHV families to be added to the agency's waiting list without public notice of opening or closing the waiting list. If AAHC has adopted a preference for EHV families, AAHC may apply the appropriate preference to EHV families placed on the waiting list. HUD encourages AAHC to advise EHV families when they have been placed on the HCV waiting list.

HUD notes that AAHC also requests a waiver of the Administrative Plan requirements at 24 CFR 982.54(d)(1). Notice PIH 2025-19 states that PHAs must complete the process for updating the Administrative Plan and AAHC has not provided a good cause justification to waive this regulation. Therefore, HUD is not granting a waiver of 24 CFR 982.54(d)(1).

Please note that the approval of this waiver request does not constitute a waiver of requirements that are in place for PHAs that are in shortfall. PHAs in shortfall must follow the guidance of the Shortfall Prevention Team (SPT). Nothing in this waiver approval supersedes guidance from the SPT.

Should you have any questions regarding this matter, please contact Celia Carpentier, Senior Housing Program Specialist, Housing Voucher Management and Operations Division, at [Celia.Y.Carpentier@hud.gov](mailto:Celia.Y.Carpentier@hud.gov).

Sincerely,

  
for  
Benjamin Hobbs  
Principal Deputy Assistant Secretary  
Office of Public and Indian Housing