



# Mainstream Voucher Leasing During COVID-19

Facilitated by Technical Assistance Collaborative

December 14, 2020



# Webinar Logistics

- All lines are muted.
- Submit Questions through the Q&A Box.
- For technical issues - use the Chat Box & direct questions to Laura Harris.
- This webinar is being recorded. The recording, slides, and transcript will posted to the HUD Exchange.

# Introductions & Welcome

- Ashley Matthews, Housing Voucher Management and Operations Division, HUD
- Liz Stewart, Technical Assistance Collaborative
- Lisa Sloane, Technical Assistance Collaborative

# Webinar Series & Community of Practice (COP)

- This Webinar is the final in a 3-part series:
  - ▶ October 15 at 1pm: *Mainstream Voucher Basics*
    - <https://www.hudexchange.info/trainings/courses/mainstream-voucher-program-webinar/>
  - ▶ November 18<sup>th</sup> at 1pm: *Mainstream NOFA Preferences & Strategies to serve Target Populations*
  - ▶ December 14<sup>th</sup> at 1pm: *Leasing during COVID-19*
- Topic Guides & Community of Practice Opportunity
  - ▶ Late Winter/Early Spring

# Agenda

- Introductions/Welcome
- Mainstream Voucher Overview
- COVID-19 Waivers & Funding
- Leasing Strategies & Considerations
- Q&A

# Audience Poll

- What is your role?
  - ▶ PHA Executive Director
  - ▶ PHA Management Role
  - ▶ Other PHA Staff
  - ▶ Service Provider
  - ▶ Other Role



# Overview

# Mainstream Voucher Summary

- Mainstream vouchers assist non-elderly persons with disabilities.
- Provides tenant-based or project-based rental assistance.
- Aside from assisting a special population, Mainstream vouchers follow the same program policies as the regular tenant-based voucher program.
- Funding and financial reporting for Mainstream vouchers are separate.



# Applicable Guidance

- 24 CFR Part 982 & 983 (for project-based vouchers).
- [PIH Notice 2020-01](#): Revised Policies and Procedures for the Mainstream Voucher Program.
- [FY17 NOFA FAQs](#) & [FY19 NOFA Q&A](#).
- [PIH's Mainstream Voucher Page](#).



# COVID-19 HUD Notices

# COVID-19 Related Waivers/Funding

- The following PIH Notices outline various waivers and/or funding opportunities that may improve a PHA's ability to assist Mainstream eligible households during COVID-19\*:
  - ▶ [PIH Notice 2020-09](#) - applies to Mainstream Vouchers only
  - ▶ [PIH Notice 2020-22](#) - applies to Mainstream Vouchers only
  - ▶ [PIH Notice 2020-33\(HA\), REV-2](#) (supersedes Notices PIH 2020-05; PIH 2020-13)
  - ▶ [PIH Notice PIH-2020-18](#) (supersedes PIH Notice 2020-08)

\*This list does not capture all PIH Notices related to COVID-19 but highlights those most relevant to funding and leasing of Mainstream Vouchers

# PIH Notice 2020-09 & PIH Notice 2020-22

- **PIH Notice 2020-09 - Published in May 2020**
  - ▶ Authorized 30% increase in Mainstream Voucher units and budget authority for those PHAs awarded in FY17 and FY19 NOFAs
- **PIH Notice 2020-22 - Published in Sept 2020**
  - ▶ Provided non-competitive opportunity to apply for new Mainstream vouchers
  - ▶ Outlined Waivers and alternative requirements specific to Mainstream vouchers — these waivers are now captured in PIH 2020-33

# PIH Notice 2020-33(HA), REV-2 (Part 1)

- Issued November 30, 2020
- Outlines waivers to provide administrative relief to various aspects of PHA operations
- Most Waivers set to Expire 6/30/21
- Over 30 Waivers applicable to HCV and 3 specific to Mainstream covering various areas including:
  - PHA 5-Year and Annual Plan
  - Annual & Interim Examinations
  - EIV Monitoring
  - Mainstream Eligibility Age
  - Waiting List-Public Notice
  - HQS-Initial, Biennial, & Interim
  - Board Approval of PHA Admin Plan
  - Mainstream Criminal Background Screening
  - PHA Oral Briefing
  - Voucher Terms
  - Utility Allowance Schedule
  - Mainstream Initial Lease Term

# PIH Notice 2020-33(HA), REV-2 (Part 2)

As a quick reference, the chart in Attachments I of the Notice provides an updated list of all waivers and availability periods:

[https://www.hud.gov/sites/dfiles/PIH/documents/  
PIH2020-33Attachments.docx](https://www.hud.gov/sites/dfiles/PIH/documents/PIH2020-33Attachments.docx)

# Adopting Waivers in PIH 2020-33

- If the PHA adopts a waiver with an alternative requirement, the PHA must comply with all the terms and conditions of the alternative requirement.
- PHAs are required to keep written documentation that record which waivers the PHA applied to their programs(s) and the effective dates.
- A PHA does not need to notify HUD or receive HUD approval to begin utilizing these waivers/alternative requirements.
- A PHA is required to publicly post or otherwise make available to the public a list of adopted waivers and alternative requirements as soon as practicable.
  - ▶ Also required to notify affected residents and owners of any impacts that the waiver and alternative requirement (where applicable) may have on them

# PIH Notice PIH-2020-18

- Outlines Eligible Expenses for CARES Act funds as well as administrative fees under the Fiscal Year (FY) 2020 Appropriations Act.
- Under the CARES Act, this supplemental administrative fee funding may be used only for two purposes:
  - ▶ (1) any currently eligible HCV (including Mainstream vouchers) administrative costs during the period that the program remains impacted by COVID-19; and
  - ▶ (2) new COVID-19 related activities, including activities to support or maintain the health and safety of assisted individuals and families, and costs related to the retention and support of participating owners.
- The period of availability for all CARES Act Supplemental Administrative fees (including those supplemental administrative fee funds provided for Mainstream) is extended to December 31, 2021 (extended through Notice PIH 2020-24).



# Eligible Activities under PIH-2020-18\*

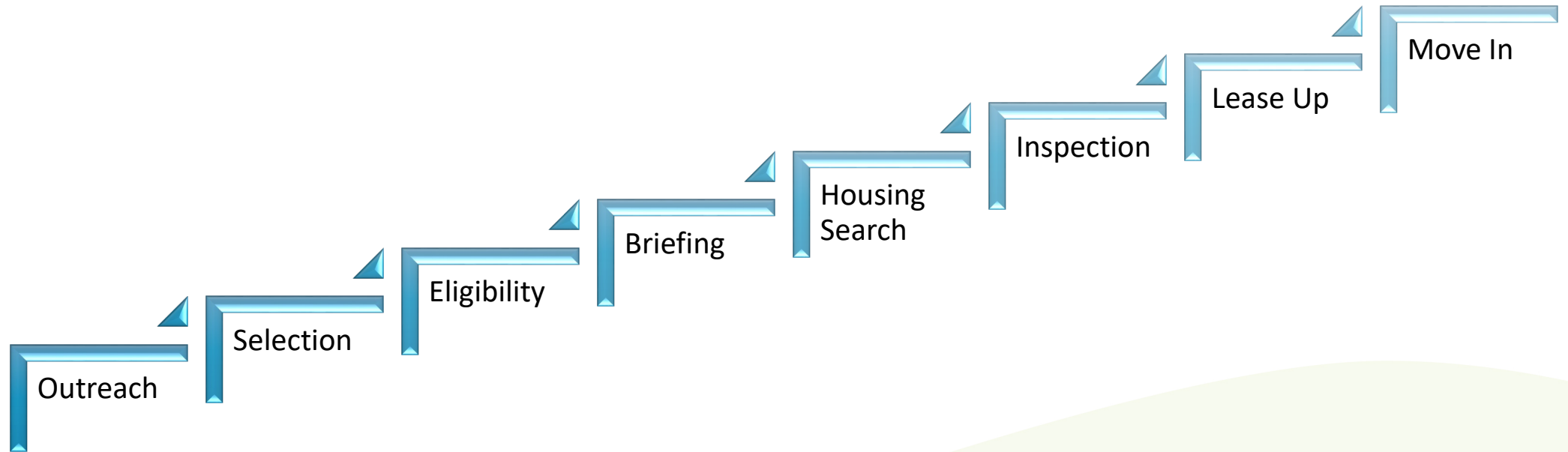
Purchasing personal protective equipment	Expenses incurred because of COVID-19 restrictions (e.g. Staff Transportation)	COVID-19 testing costs for PHA Staff and participating families
Creation or update of infectious disease outbreak plan	Physical Improvements to office space including expansion, remodel, or space rental.	Costs to facilitate and coordinate with local schools
Procuring cleaning supplies and/or services to maintain safe and sanitary HCV units including common areas	Relocation of PHA staff and participating families to health units or other designated units for testing, hospitalization, or quarantine,	Costs for the technological needs of program participants with school aged children being homeschooled
Costs to retain or increase owner participation in the HCV Program, such as incentive costs	Costs for providing childcare for the children of PHA staff	Costs associated with the delivery of goods, including food and medical supplies to program participants

\*This does not represent the full list of eligible activities or specific details of each activity. See PIH Notice 2020-18.



# Leasing Strategies & Considerations

# Mainstream Voucher – Process Challenges



# POLL - Onsite Staffing Operations

- What changes have you made to onsite staffing operations due to COVID-19? Check any that apply:
  - ▶ Majority of Staff are working fully remote- primarily conducting activities via phone, mail and email
  - ▶ Mix of Staff working remote and some in the office with precautions in place (mask wearing, social distancing, etc).
  - ▶ In-person appointments restricted to those needing a reasonable accommodation
  - ▶ Established drop-boxes/mail slots for documentation submission
  - ▶ Only minimal or no changes to staffing operations

What other changes have you made? Enter in chat box to all Attendees & Panelists

# Outreach, Selection & Eligibility

- Engage with Important Partners
  - ✓ Continuum of Care
  - ✓ Centers for Independent Living
  - ✓ Service providers for various populations
  - ✓ Homeless providers
  - ✓ Other community partners
- Identify key primary and secondary points of contact to ensure ongoing communication
- Assess current remote communication strategies and identify additional enhancements

# Outreach, Selection & Eligibility (Part 1)

- Establish alternative processes where necessary to assist with notification & documentation collection
  - ▶ Electronic transmission of information to families
  - ▶ Using self-service features on the PHA's website if available
  - ▶ Providing business-reply envelopes or secure drop-box apparatuses for families that do not have access to the Internet
- Consider changes to PHA admin plan and policy/procedures that can assist in identifying and leasing households quickly.
  - ▶ Adoption of specific preferences (e.g. move-on preference)
  - ▶ Reducing documentation burden where possible

# Outreach, Selection & Eligibility (Part 2)

Requirement	Waiver
<p><b>Waiting List Public Notice:</b> Must give public notice by publication in a local newspaper of general circulation and also by minority media. See 24 CFR § 982.206(a)(2).</p>	<p>May provide public notice in a voicemail message on its main or general information telephone number and through its website (if such a PHA website is available). The period of availability ends on June 30, 2021.</p>
<p><b>Administrative Plan:</b> 24 CFR § 982.54(a) The regulation requires that any revisions of the PHA’s administrative plan must be formally adopted by the PHA Board of Commissioners or other authorized PHA officials.</p>	<p>HUD is waiving the requirement to allow the PHA administrative plan to be revised on a temporary basis without Board approval through March 31, 2021. Any informally adopted revisions under this waiver authority must be formally adopted no later than June 30, 2021.</p>
<p><b>Criminal background screening:</b> PHAs are required to apply the same criminal background screening process to all HCV participants. See 24 CFR § 982.206(a)(2).</p>	<p>PHAs may establish screening requirements for applicants for Mainstream Vouchers which are distinct from those in place for its HCV program in general. *Must still comply with the statutory requirements (e.g. lifetime sex offender requirement). The period of availability ends on June 30, 2021.</p>
<p><b>Mainstream Age Eligibility:</b> The eligible member of a Mainstream household must be non-elderly, defined as at least 18 years of age and under 62 years of age (not yet reached their 62nd birthday) to be eligible to be placed under HAP contract. See 42 U.S.C. 8013(k)(2).</p>	<p>The PHA may choose to expand the definition of an eligible non-elderly family member to include those who were issued a voucher prior to turning 62 and were not yet 63 on the effective date of the HAP Contract. The period of availability ends on June 30, 2021.</p>
<p><b>PHA Oral Briefing:</b> The regulation requires when the PHA selects a family to participate in either the HCV or PBV program, the PHA must give the family an oral briefing.</p>	<p>HUD is waiving this requirement and as an alternative requirement allowing the PHA to conduct the briefing by other means such as a webcast, video call, or expanded information packet. The period of availability ends on June 30, 2021.</p>

# FAQ - Documentation

## Question:

- It can be challenging for applicants to obtain documentation such as social security numbers and other information. Can we allow families to move in and verify these documents at a later date?

## Answer:

- No, the waiver authority granted in PIH Notice 2020-13, REV-1 does not apply to eligibility requirements for admission. All current eligibility requirements remain in place at this time, but HUD will take these suggestions under advisement for future consideration.



# FAQ - Income Verification

## Question:

- Does waiver PH and HCV-3 Family Income and Composition: Annual Examination Income Verification (EIV) requirements apply to initial certifications?

## Answer:

- No, PIH Notice 2020-13, REV-1 does not change the income verification hierarchy for new admissions to the program.

# FAQ - Use of Technology

## Question:

- Can I use CARES Act funds for new software to automate the applicant intake and lease signature processes? Can we use text messaging to alert applicants on the waiting list of their status? How about software modules to allow online reporting for interim changes via our website? (Updated 9-29-2020)

## Answer:

- While this software would help the PHA maintain social distance, which prevents transmission of COVID-19, it also improves the operational efficiency of the Public Housing and HCV management and operations. As such, it is a normal Operating Fund and HCV Administrative fee expense, and eligible for CARES Act funds. See PIH Notice 2020-07 for public housing and PIH Notice 2020-18 for HCV Administrative fees.

# Remote Voucher Briefings

- [PIH Notice 2020-32](#) – Guidance to PHAs on allowability of Remote Hearings and Remote Briefings
- Applies to all PHAs that choose to implement a remote environment for voucher briefings. Remains in effect post-COVID-19.
- Briefings may be conducted telephonically, via video-teleconferencing, or through other virtual platforms absent a request by a party for an in-person hearing or briefing.



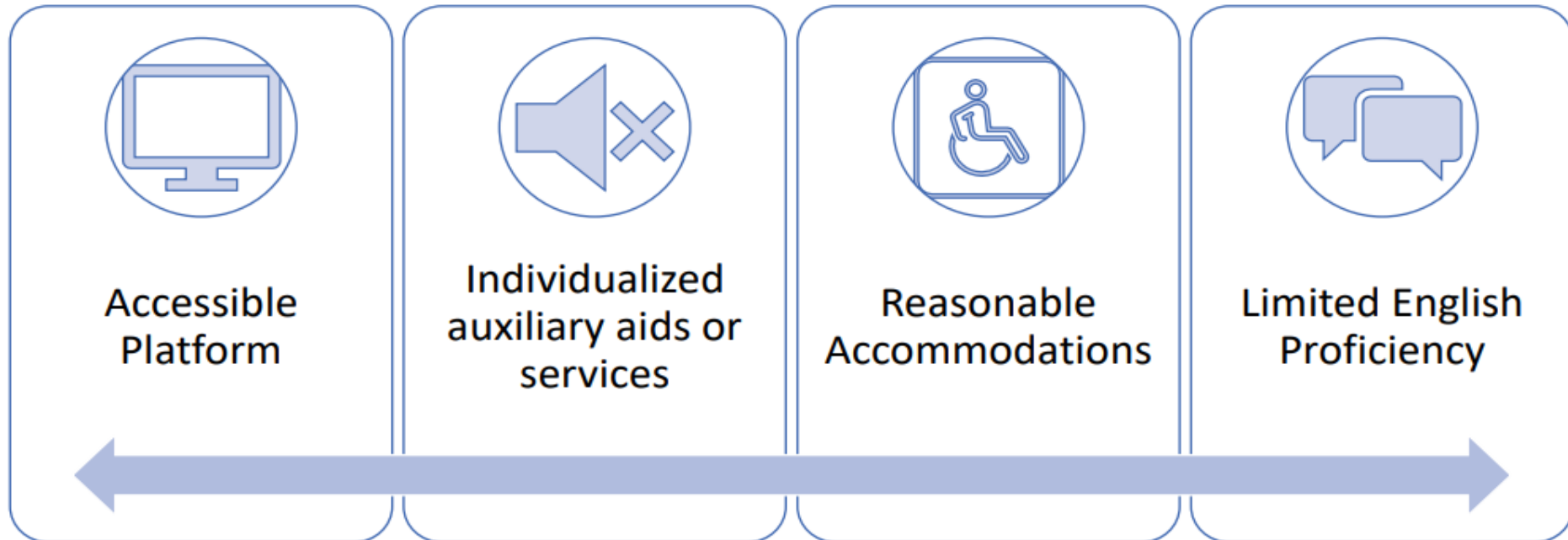
# Remote Voucher Briefings

## PIH Notice 2020-32

- Must ensure equal opportunity and nondiscrimination for the remote briefing
  - ▶ Individuals with disabilities
  - ▶ Limited English proficient (LEP) persons
- Identify and resolve technology barriers prior to scheduling the remote hearing or remote briefing
- Making the determination if a remote hearing or remote briefing can take place
- Presenting documents prior to the remote hearing or remote briefing
- Updating written policies

# Remote Voucher Briefings PIH Notice 2020-32 (Part 1)

## Requirements for Disabled Persons and Limited English Proficient (LEP) Persons



# Remote Voucher Briefings

## PIH Notice 2020-32 (Part 2)

- No explicit requirement for the oral briefing to be held in person. If the briefing is remote, PHAs must provide an opportunity for remote briefing participants to ask questions.
- Best Practices:
  - ▶ Review voucher obligations with families at reexamination.
  - ▶ Have PHA staff reach out directly to tenants by phone after the briefing.
  - ▶ Consider the impact of families attending briefings remotely on other program functions.

# Housing Search

- Partners can assist households in housing search activities including negotiating with landlords
- Employ effective landlord engagement strategies
  - ▶ Single Point of Contact
  - ▶ Flexibility with Check runs
  - ▶ Incentives to participate (either through community resources or use of PHA admin fees)
  - ▶ Alternative Inspection Methods
- Provide participants reasonable timeframes and extensions for identifying units
  - ▶ HUD is waiving the requirement that the extension(s) must be accordance with the PHA's administrative plan in order to allow the PHA to provide extensions even though it has been unable to formally amend its policy in the administrative plan.

# HUD Landlord Engagement Resources

- PHAs may use CARES Act Administrative Fees for Costs to retain or increase owner participation in the HCV Program, such as incentive costs
  - ▶ e.g., the PHA offers the property owner/landlord an incentive payment to participate in recognition of added difficulties of making units available for HCV families to rent while stay-at-home orders or social distancing practices are in effect
- HUD released one chapter of the [HCV landlord strategy guidebook](https://www.hud.gov/program_offices/public_indian_housing/programs/hcv/landlord/guidebook) at [https://www.hud.gov/program\\_offices/public\\_indian\\_housing/programs/hcv/landlord/guidebook](https://www.hud.gov/program_offices/public_indian_housing/programs/hcv/landlord/guidebook)
- HUD's [landlord resource page](https://www.hud.gov/program_offices/public_indian_housing/programs/hcv/landlord) ([https://www.hud.gov/program\\_offices/public\\_indian\\_housing/programs/hcv/landlord](https://www.hud.gov/program_offices/public_indian_housing/programs/hcv/landlord)) includes links to webinars on HCV landlord participation and reference sheets on important aspects of the HCV program for landlords
- PHAs may also consider using the waivers and alternative requirements of PIH 2020-33 to streamline aspects of the HCV Program that impact landlords.



# Poll - Landlord Incentive Payment

- Does your PHA currently offer a Landlord Incentive Payment to participate in your program?
  - ▶ Yes, we implemented an incentive payment
  - ▶ Not yet, but we are planning on implementing one
  - ▶ No, but we are considering it
  - ▶ No and do not plan on it.

# Initial Inspections - Waivers

HQS Requirement	Waiver/Alternative Requirement	Additional Information
<p><b>Initial Inspection Requirements:</b> PHA must inspect the unit before any assistance payment is made to determine whether the unit meets HQS</p>	<p>PHA may rely on the owner's certification that the owner has no reasonable basis to have knowledge that life threatening conditions exist in the unit or units in question instead of conducting an initial inspection.</p>	<p>PHA is required to conduct an HQS inspection on the unit as soon as reasonably possible but no later than the 1-year anniversary date of the owner's certification. The period of availability ends on June 30, 2021.</p>
<p><b>Initial Inspection: Non-Life-Threatening Deficiencies (NLT) Option:</b> PHA can choose to approve an assisted tenancy, execute the HAP contract, and begin making housing assistance payments on a unit that fails the initial HQS inspection, provided the failure is the result only of NLT conditions. Housing assistance payments must be withheld if the NLT conditions are not corrected within 30 days.</p>	<p>HUD is waiving the requirement that the PHA must withhold the payment if the NLT repairs are not made in 30 days. PHA may provide an extension of up to an additional 30 days to the owner to make the NLT repairs and continue to make payments to the owner during the period of that maximum 30-day extension.</p>	<p>The period of availability for the PHA to approve an extension of up to an additional 30 days ends on June 30, 2021.</p>
<p><b>HQS Initial Inspection Requirement: Alternative Inspection Option:</b> PHA has option to authorize occupancy of a unit prior to the initial inspection being completed if the unit had in the previous 24 months passed an alternative inspection. PHA may then make assistance payments retroactive to the beginning of the lease term once the unit had been determined to meet HQS pursuant to the PHA's inspection.</p>	<p>HUD is waiving the requirement that the PHA must conduct its own inspection of the unit in order to commence making assistance payments under the Initial Inspection – Alternative Inspection option. PHA may commence assistance payments at the beginning of the lease term based on the alternative inspection and the owner's certification.</p>	<p>The PHA must conduct the HQS inspection for the unit as soon as reasonably possible but no later than the 1-year anniversary date of the owner's certification. The period of availability for the waiver to place a unit under HAP contract and commence payments ends on June 30, 2021</p>

# Remote Video Inspection

- [PIH Notice 2020-31](#)- Issued 11/12/2020
- Gives PHAs guidance on conducting Housing Quality Standards (HQS) inspections using Remote Video Inspections (RVIs).
- In RVIs, an HQS inspector performs an HQS inspection from a remote location using video streaming technology via a person at the inspection site who serves as a proxy.
- Outlines best practices for 4 different phases: (1) administrative preparation, (2) pre-inspection planning, (3) performance of the inspection and (4) post inspection

# Poll: Video Inspections

- Are you conducting video inspections?
  - ▶ Yes, we've been doing video inspections for a number of months
  - ▶ Yes, we just started doing video inspections
  - ▶ No, but we are planning on doing video inspections
  - ▶ No and we don't plan on it
- If you are doing video inspections- put in the chat if you are using any specialized apps or software

# Lease-up & Move-in

HQS Requirement	Waiver/Alternative Requirement	Additional Information
<p><b>Initial Lease Term: Mainstream Vouchers</b> Under the HCV program, voucher participants must enter into an initial lease term with the owner for one year, unless the PHA determines that a shorter term would improve housing opportunities for the tenant and the shorter term is a prevailing market practice.</p>	<p>For Mainstream voucher holders, the PHA may enter initial lease terms of less than one year regardless of whether the shorter lease term is a prevailing market practice.</p>	<p>The period of availability ends on June 30, 2021.</p>
<p><b>PHA Approval of Assisted Tenancy: When HAP Contract is Executed</b> The PHA may not make any housing assistance payments to the owner until the HAP contract is executed. The regulation provides that PHA must use best efforts to execute the HAP contract before the beginning of the lease term and that the HAP contract must be executed no later than 60 days from the beginning of the lease term. Any HAP contract executed after the 60-day period is void and the PHA may not pay any housing assistance payments to the owner.</p>	<p>HUD is waiving the regulatory requirement to allow PHAs to execute the HAP contract after the 60-day deadline has passed and make housing assistance payments back to the beginning of the lease term. However, the PHA and owner must execute the HAP contract no later than 120 days from the beginning of the lease term.</p>	<p>The period of availability to execute the HAP contract after the normally 60-day period from the beginning of the lease term ends on June 30, 2021</p>

# FAQ - Lease Signing

## Question:

- Can we switch to electronic signatures for leases and forms?  
Do we need a third-party verification software for validation?

## Answer:

- This answer depends on your state or agency's own policies. There are no requirements for third-party verification for these documents in the public housing or HCV regulations.

# Staffing Capacity Considerations

- Identify key contacts/decision-makers, and alternate ways to reach them.
- Identify and authorize secondary and tertiary contacts if the key contact is not available.
- Assess current remote communication strategies and identify additional enhancements, e.g., free to low-cost Wi-Fi and computing equipment
- Utilizing flexible worksite (e.g., telecommuting) and flexible work hours (e.g., staggered shifts)? Telework may be a primary strategy, along with social distancing and position reassignments.
- Champion wellness, including mental health. Learn more about a trauma-informed approach at:  
<https://store.samhsa.gov/sites/default/files/d7/priv/sma14-4884.pdf>.

# Resources

- COVID-19 related FAQs for PHAs:  
<https://www.hud.gov/sites/dfiles/PIH/documents/Round6FAQsfinal.pdf>
- CARES Act Reporting – Answers to FAQs for PHAs:  
[https://www.hud.gov/sites/dfiles/PIH/documents/FAQs CARES Act Reporting v102320.pdf](https://www.hud.gov/sites/dfiles/PIH/documents/FAQs_CARES_Act_Reporting_v102320.pdf)



# Reminders

- Webinar recordings and materials will be posted to HUD Exchange
  - Mainstream Voucher Basics  
<https://www.hudexchange.info/trainings/courses/mainstream-voucher-program-webinar/>
  - Mainstream Voucher NOFA Preferences & Strategies  
<https://www.hudexchange.info/trainings/courses/mainstream-voucher-nofa-preferences-strategies-webinar/>

# Questions?

