HCV Best Practices: Strategies to Maximize Use of SPVs Supplemental Q&A

1. If I was allocated 400 TPV but only used 40, does the 40 roll over to regular vouchers when the participants leave the program? What happens to the remaining TBV vouchers when they are not used?
    a. **Panelist response:** TPV vouchers are allocated for special populations of people. If there aren't enough people in the specified population to receive those vouchers, the remaining vouchers go into your regular voucher allocation, and you start pulling people from the waiting list to get them leased up. When the 40 families that received the vouchers leave the program for whatever reason, those TPV vouchers become regular tenant-based vouchers and leased accordingly.

2. Can you explain what you mean by working with surrounding PHAs to increase leasing?
    a. **Panelist response:** Some agencies reach out to neighboring housing authorities and ask if they are interested in entering into an agreement that would allow each agency to lease in the jurisdiction(s) of the other. This may expand the pool of available units and remove the administrative requirements relative to portability. A 52665 would not be needed to lease with a neighboring agency, as the voucher holder would not be *porting out*. This agreement can be executed with more than 2 agencies. The agreement authorizes the agencies to lease outside of the assigned jurisdiction and within the jurisdictions of each agency that joins in the agreement.

3. What qualifies for an incentive payment? And what is the assurance fund used for?
    a. **Panelist response:** If a landlord has new units that are going to be accepting Section 8 vouchers, they are entitled to receive the $500 incentive. So, these are for new units that are coming on board.
    b. **Additional response:** Prior to the availability of COVID-19 administrative funds, MTW HCV programs were the only ones with the latitude to provide landlord incentives. The deadline to use COVID funds for landlord incentives is fast approaching. However, agencies awarded Emergency Housing Vouchers can choose to allocate funds for landlord incentives from the allocated *Service Fee* as described PIH Notice 2021-15.

4. Due to extremely limited rental stock combined with COVID impacts, it looks like we'll need to return some of our Mainstream vouchers. How do you go about returning them?

a. **Panelist response:** Contact your HUD office and ask what the process is to return vouchers.

b. **Panelist response:** Generally speaking, you wouldn't return the Mainstream Vouchers; however, your utilization rate would affect your funding level in future years. But our experience with the Mainstream Program has been that if market conditions improve and you are able to perform additional leasing to get those Mainstream Vouchers fully utilized, HUD been very good in providing supplemental funding in any year that that you might have otherwise been short. So, you shouldn't even ask to have an ACC reduced because you don't want to lose that opportunity to lease those vouchers in the future year when conditions improve.

c. **Additional response:** Be sure to check with your partners before returning any Mainstream Vouchers as they were awarded based on the demonstrated need. You mentioned the limited housing stock. Is it limited because of the number of units or the affordability of those units? Are there some exceptions your agency can request HUD approve to help get these vouchers leased? Are your payment standards set at the maximum allowable level of 120% of the Fair Market Rent, as allowed for families with an approved reasonable accommodation? Is there some assistance your partner agencies can provide to assist with leasing? Generally, you do not want to return vouchers. But keep in mind that HUD has the authority to recapture unused Mainstream Vouchers if their utilization rate is less than 80%.

5. What is income source protection, which was discussed by Tampa in regards to eliminating housing stock barriers?

a. **Panelist response:** Probably about two years ago, one of our neighboring cities, St. Petersburg, they were going to implement income source protection. Having lower income or having a voucher is not a federally- protected class. So, what was happening in this community and communities around Hillsborough County was that a trend started where landlords were saying that “we are not going to rent to you because you have a voucher.” So basically, directly, they were saying, “because you have a low source of income, we are not going to rent to you.” So, now we can say these families are protected. So, I did a survey to our community. And the number one thing that was seen over and over and over again, is that there were units at that time that landlords were not willing to rent because there could be a little bit of red tape, they would have to go through an inspection process. But now landlords cannot outrightly state to a voucher holder, “we cannot rent to you because you have a voucher.” They can definitely go through the screening process and establish a great credit check or whatever, but to deny because of source of income, it has been protected in this community. So, we are now looking at the city of Tampa imposing those actual protections. And a lot of communities throughout the country, states, counties, jurisdictions have already established it. I think Miami was the first community in Florida that did that. So, I haven't seen any trends yet, because it was just established in March of 2021. The

Pandemic hit, so that skewed numbers, but we're hoping to see some kind of data later next year to see if that really was a benefit. I can say that when that program was implemented, we did have an increase in uptake in landlords registering for our program. They may not have had a client, but they did register as an owner, potential owner.

b. **Additional response:** This type of local ordinance seems to be gaining traction as a tool to limit discrimination relative to voucher holders. It informs rental property owners and managers that they cannot refuse to lease to voucher holders solely because they have a voucher.

6. When working with surrounding agencies, would we just have to do an MoU, and the housing authority would process it as our own voucher although in different jurisdictions, and do we need to get this approved by HUD?

a. **Panelist response:** I don't know that HUD's approval is required, but it's always good to inform HUD of what you are doing. But, the answer, essentially, is yes. It's an agreement between or among agencies to lease within each other's jurisdictions. And, yes, you can just lease up normally like you would in your own jurisdiction. The same rules apply, or any rules you specify in the agreement you have with the other agencies. This type of agreement is generally for agencies in the same metropolitan area using the same Fair Market Rents.

7. Our state law does not allow landlords to collect more than one month's rent; when offering an extra amount of security deposit, does this not break the state law?

a. **Panelist response**: I don't know that any of us are equipped to answer that. That's a legal question, and I would refer you to your legal counsel or state law.

b. **Panelist response:** We did contact our legal services, and we researched the Florida state statute to determine with that, if we could provide an extra security deposit, and there was no regulation or anything that we found that prohibited us from doing that.

8. Can you go over the different payment standards of the higher areas in our jurisdiction?

a. **Panelist response:** Payment standards generally are set between 90% and 110% of the Fair Market Rent. For your Emergency Housing Vouchers, agencies are allowed to go up to 120% of Fair Market Rents to establish payment standards to assist those families. If you have a family that has an approved reasonable accommodation, they could possibly be approved to have their payment standard set at 120% of the Fair Market Rent without HUD approval. If you need a payment standard higher than 120% for families with an approved reasonable accommodation, you will have to submit that request to HUD. If you have an agency that doesn't use Small Area FMRs but there are Small Area FMRs approved for their area, they can use those Small Area FMRs as long as the payment standard they establish does not exceed 110% of the Small Area FMRs. If you choose to do that, you need to inform HUD of this decision.

9. How do the panelists work with their VA regarding the need for additional referrals? Our attrition outpaces the number of referrals and new admissions.

   a. **Panelist response:** This is one of the topics that always comes up every single time I'm on our monthly call with our HUD Miami Rep. This is a very important call because we do talk about leasing. One of the struggles that I've had, and it's probably occurred within the last two to three years, is that I felt like we are just not getting enough referrals. Because as shown in my slides, our leasing rate, success rate is 69%. So, in order to get us to 100%, when we were down 113 vouchers, we had to put at least 165 voucher holders on the street to meet that need. So, I have been relaying that over and over and over again through our monthly meetings, through our veteran meetings, and through our biweekly meetings. This was a topic of constant conversation. And when I literally scrubbed the list, the Coordinated Entry list that's compiles all the veterans in this community, at this given point in time… and I even advertised on our website; I was not convinced that we did not hit every veteran in our community. I felt like there were veterans out there- there has to be! There's no way that there's not. I advertised on our website, “hey, if you're a veteran, contact the VA, the Tampa Housing Authority; we have vouchers.” I received two responses. So, I had to come to the conclusion that, based on the data, based on our conversations, based on the CoC information that we gathered through our HMIS System, that we, as a community for the last 13 years, have really addressed that homeless population for our veterans, and in a manner that either we have a plethora of resources, meaning we have extra funding, that we don't have to the referrals because these veterans have been taken care of. So, I think the first thing to start with is really reach out to the CoC in your community. Have that dialogue with the VA and talk about how many veterans do you come across? How many are on your waitlist? How do we get more? Because the one thing we know as housing providers is, you just can't put one voucher on the street, as it takes maybe five to get that one leased because the success rate changes throughout the community. So, that was my struggle. And when I came to terms by looking at data, by having the conversations, we said that we probably have housed as many veterans that we can house, and now we're going to start looking at do we contact HUD: what do we do next? So, it's really scrubbing the data, looking at the veterans that are homeless. Thankfully, we do have that Coordinated Entry Process where all veterans are placed into this system, whether they qualify for the HUD-VASH Voucher or not. And that way, we can look at that, and that data needs to be scrubbed. If not every two weeks, at least monthly, so you can really get a good feel of what's in your community to get those referrals.

   b. **Panelist response:** There's no one golden arrow strategy that's going to get you there. A lot of it is a partnership; it is meeting with the VA regularly. And, when it's bad, we're talking weekly; when we're a little more stable, maybe it goes down to monthly, and in between, maybe it's that biweekly. And, we're not just talking with the VA during those very official meetings; our staff is also empowered to pick up the phone and say we're having this specific problem. If I have more exits coming out than I have bodies coming in, we make sure the VA understands that. They are not trained to house, so we make sure they understand. We bring the data, and we make sure they understand it. That means showing them, look, we've had this many people leaving, and then we start going with strategies for how do we keep people housed? Why are these people leaving? Are they good reasons like buying a house or the ones we can't necessarily stop, like they're passing away? Or, are these ones where people got scared? Or, they just walked away instead of talking to their case manager? And how do we manage those? Another thing that we're starting with now is we have a pilot program that was approved by the VA and HUD in Washington, DC that we started a few months ago, where we have lower acuity veterans working with our county's veteran's agency with a different type of case management that's a little bit lighter touch. And we're doing some different things with that. This is actually allowing the VA case managers to be freed up to work with those higher acuity clients. But at the end of the day, for us, at least a lot of it is about that partnership. It's about communication. It's about making sure the VA understands what the problem is. And that means not just complaining about it. But, we have found for us, we are a very data-driven organization; we found we have better success when we actually are bringing the data, and we're sharing that data so that they can really see it and understand it, especially because you end up having these conversations a lot. So those are some of the things we've been doing to help work on that.