



Mainstream Voucher NOFA Preferences & Strategies

Facilitated by Technical Assistance Collaborative

November 18, 2020



Webinar Logistics

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

Agenda

- Introductions/Welcome
- Mainstream Voucher Overview
- Mainstream NOFA Preferences
- Waiting List Management
- Strategies to Serve Target Populations
- Q&A

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

Audience Poll

- What is your role?
 - ▶ PHA Executive Director
 - ▶ PHA Management Role
 - ▶ Other PHA Staff
 - ▶ Service Provider
 - ▶ Other Role
- For those PHAs with a recent award of Mainstream vouchers, which NOFA preferences, if any, did you establish?
 - ▶ Transitioning out of Institutions or Segregated Settings
 - ▶ At Risk of Institutionalization
 - ▶ Currently Experiencing Homelessness
 - ▶ At Risk of Homelessness
 - ▶ Formerly Homeless and currently in PSH/RRH project (i.e. Move-on Preference)

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)
- HUD Notices
 - ▶ [PIH Notice 2020-01](#): Revised Policies and Procedures for the Mainstream Voucher Program.
 - ▶ [PIH Notice 2020-09](#)
 - ▶ [PIH Notice 2020-22](#)
- [FY17 NOFA FAQs & FY19 NOFA Q&A](#)
- [PIH's Mainstream Voucher Page](#)

Mainstream NOFA Preferences

Mainstream NOFA Admission Preferences

Recent NOFAs incentivize PHAs to provide preferences to non-elderly persons with disabilities who are:

- ▶ Transitioning out of institutional or other segregated setting,
- ▶ At serious risk of institutionalization,
- ▶ Homeless,
- ▶ At risk of becoming homeless, and/or
- ▶ Previously experienced homelessness and currently a client in a permanent supportive housing or rapid rehousing.*

*FY19 NOFA Only

Target Population-Definitions

- Both FY17 & FY19 provide target population definitions to be used as a Guide for PHAs
- These definitions primarily follow existing definitions outlined in other federal regulations or Acts (i.e. McKinney-Vento).
- Both NOFAs outline that PHAs may use applicable local or state definitions if available as long as individuals who fall under these definitions are still eligible (i.e. non elderly person with a disability)
- PHAs must follow the verification hierarchy when verifying preference eligibility, however, HUD does not have specific requirements for verifying preference eligibility. Available verification will depend locally.

Preferences

- Preferences affect the order in which families on the waiting list receive assistance.
- PHA's preference must be documented in the PHA Plan and the Section 8 Admin Plan.
- PHAs may not establish a preference for people with a specific type of disability.
- The preference cannot be applied only to Mainstream vouchers.
- PHAs must give public notice when opening the waiting list but may open the waiting list only for certain preferences and is not required to close the waiting list.

Preference Options

- The preference may be limited to a certain number of applicants
 - e.g. once 50 families have been served under the preference, the preference expires (OR the PHA may state that the preference remains for up to 50 families at a time. "
- PHAs that wish to target their assistance to one of the NOFA targeted groups may adopt a preference for just that group.
 - For example, PHA may adopt a preference only for those transitioning out of institutional or other segregated settings.
 - If your PHA claimed points for a preference in a Notice of Funding Availability (NOFA) application, your PHA must adopt a preference for at least one of the targeted groups in the NOFA
- PHAs can weight and layer preferences using points.
 - e.g. Residency preference=2 points, homeless preference=3 points

Referrals

- Cannot have a preference specifically for referrals from organizations that exclusively serve persons with certain types of disabilities.
- PIH Notice 2013-15 provides that PHAs may adopt a preference specifically for the Coordinated Entry system as it is not disability specific.
- This preference can be layered on other preferences.

FAQ- Choice of Preferences

Question:

- Can we target just the homeless/at risk of becoming homeless? We have a preference on our waiting list for Homeless and one for Disabled already. We have over 600 people on our waiting list for this target area. Our area does not have institutions for folks to transition out of so I am not sure how we would target that area.

Answer:

- Yes, your PHA may target non-elderly persons with disabilities who are homeless or at risk of becoming homeless. You may establish partnerships with organizations that assist this target population.

FAQ- Move-On Preference

Question:

- One of the admissions preference categories is: “non-elderly persons with disabilities who are currently a client in a permanent supportive housing or rapid rehousing project.” Are PHAs allowed to limit that preference to solely “non-elderly persons with disabilities who are currently a client in a permanent supportive housing” or, alternatively to “non-elderly persons with disabilities who are currently a client in a rapid rehousing project.”

Answer:

- YES

Waiting List Management

Waiting List Management

Waiting List Administration	
PHAs must maintain one waiting list for all tenant-based assistance, including Mainstream voucher assistance	24 CFR 982.204(f)
Housing agencies may limit the number of people who will qualify for a preference	24 CFR 982.207(a)(3)
Housing agencies may adopt criteria defining which families may apply for assistance when opening their waiting lists	24 CFR 982.206(b)(1)
Housing agencies must have written policies for how preferences will be applied (either first-come, first-served or by random selection)	24 CFR 982.207(c)
Must adopt a preference for one of more of the targeted groups listed in the NOFA if claimed in NOFA application	FY17 and FY19 NOFAs

Waiting List Management - Updating (1 of 2)

- If there is a change in Eligible Population, determine whether PHA will do a **full waiting list update** or a **limited update**. A full or limited update may be done regardless of whether a PHA will be opening the waiting list or not.
- Full Waiting List Update- Required if establishing new preferences
 - ▶ Update entire existing waiting list to determine if all current applicants meet the eligibility criteria for Mainstream vouchers and new preferences

Send Letter out
to all Applicants

Update list
based on
preference
order

First eligible
Mainstream
family pulled
from HCVP
waiting list

Waiting List Management - Updating (2 of 2)

- Limited Waiting List Update-Only applicable if PHA is NOT adopting a new preference
 - ▶ PHA may determine the eligibility of existing families on the waiting list in smaller batches
 - ▶ Ex: Contact the top 30 families on the waiting list to determine if any of these families qualify for a Mainstream Voucher, offering a Mainstream Voucher to the first family that includes a non-elderly person with disabilities in the order they appeared on the waiting list

FAQ- Lack of HHs meeting preference

Question:

- We have had a difficult time leasing the Mainstream vouchers we were awarded in 2018, so we are not sure if we are ready to apply for more vouchers yet. We established a limited preference in accordance with the NOFA for 25 families, however, we have only been able to lease up 3 families under this preference. We do not have anyone else on our waiting list that meets the preference criteria, so we have not been able to issue any more vouchers. What should we do?

Answer:

- The PHA is required to make a good faith effort to recruit families that meet the preference criteria. If they cannot find families that meet the preference criteria, the voucher may go to the next eligible family on the waiting list, i.e. a family that includes at least one non-elderly person with disabilities.

FAQ- Using CES

Question:

- HUD guidance states that PHAs cannot develop direct referral partnerships. Is a preference for persons experiencing homelessness referred by a CoC's CES not considered a "direct referral"? Please clarify.

Answer:

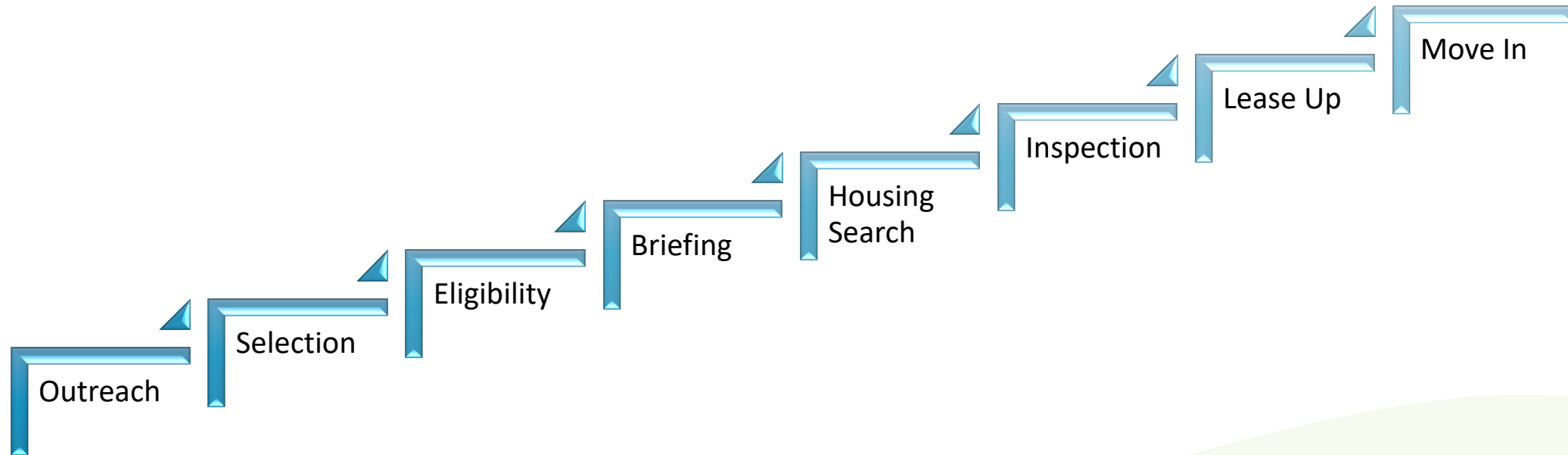
- Some organizations only serve persons with certain types of disabilities. These organizations may refer applicants; however, the PHA may not establish a preference specifically for referrals from an organization or organizations that limit their services based on disability type.

The NOFA encourages PHAs to partner with these organizations because they are critical to assisting persons with disabilities. However, PHAs may not set up exclusive referral partnerships with these organizations. PIH Notice 2013-15 describes a specific instance where a direct referral preference may be allowable without violating fair housing laws because Continuum of Care Coordinated Entry Systems typically do not base assistance on disability type. PHAs may use the guidance provided in PIH Notice 2013-15 to structure a referral preference, however, the PHA must still ensure that fair housing laws are not violated. PHAs still must follow the regulations on waiting list administration and program admissions, including the requirement to use the waiting list for admissions (982.202(a)(2)).

Q&A TIME

Strategies to Serve Target Populations

Mainstream Voucher Program – Challenges



Mainstream Voucher Program – Important Partners

- ✓ Continuum of Care
- ✓ Centers for Independent Living
- ✓ Service providers for various populations
- ✓ Homeless providers
- ✓ Other community partners

Audience Poll

- Do you currently partner with any of the following organizations?
Check all that apply.
 - ▶ Continuum of Care (CoC)
 - ▶ Center for Independent Living
 - ▶ Service Provider
 - ▶ Homeless provider
 - ▶ Other
 - ▶ We did not intentionally partner with any agency

Mainstream Voucher Activities Requiring Partner Support

- **Outreach** – who will be identifying persons in the target population(s)?
- **Application** – how will applicants be assisted in securing needed documentation?
- **Housing Search** – how will participants be assisted with housing search?
- **Move-in** – who will provide funds for move-in such as security deposit, furniture, move-in costs. Who will assist with the actual move-in?
- **Reasonable accommodations** – who will assist the tenant in making requests?
- **Supports** – how will voluntary services be made available to tenants? How will partners help tenants to sustain tenancies? How will partners assist if tenant is not complying with lease requirements?
- **Portability** – how will partners assist a participant to port their voucher and identify services/supports in their new locale?

Partnerships – What Works!

- Meet regularly, and as often as needed
- Establish clear roles and responsibilities
- Engage in level setting
 - ▶ Don't assume your partners know what is important to you
- Set goals, e.g. specific timeframes and metrics
- Consider using a Memorandum of Understanding (MOU)
- Expand partnerships as needed to meet needs of participants

Partnership Examples



What MFP and CILs Can Offer PHAs

- Relationships with the target population - quick utilization!
 - ▶ [Money Follows the Person \(MFP\) programs](#) help people with disabilities transition from nursing facilities
 - ▶ [Centers for Independent Living](#) help people with disabilities transition from institutions
- Access to resources such as:
 - ▶ MFP can offer one-time community transition costs, pre-tenancy and tenancy supports, home accessibility modifications, and state-level housing-related collaborative activities
 - ▶ CIL Core Services include: IL skills training, information & referral, institutional transition, peer counseling & peer support
- Coordinate/provide ongoing tenancy supports

Example of Institutional Preference

- Inappropriately Institutionalized – 8 points
- A household member lives in a nursing home or an Intermediate Care Facility for persons with Developmental Disabilities (ICF-DD), is being treated in a psychiatric facility or other residential treatment facility or is incarcerated in a jail or correctional setting:
 - ▶ Nursing home
 - ▶ ICF-DD
 - ▶ Has been hospitalized in a psychiatric facility (or psychiatric unit in a general hospital) for longer than fourteen days
 - ▶ Other licensed residential treatment facility
 - ▶ Has been incarcerated in jail or a correctional facility for longer than 30 days

What CoCs Can Offer PHAs

- Relationships with the target population- quick utilization!
 - ▶ Coordinated Entry to identify applicants
 - ▶ Coordinating outreach and referral
- Access to CoC wide system resources such as:
 - ▶ System to track/monitor referrals
 - ▶ Housing Search
 - ▶ Security deposit
 - ▶ Furniture and move-in costs
 - ▶ Move-in assistance
 - ▶ Coordinating service/supports
- Coordinate/provide ongoing tenancy supports

Using CES for referrals

- PIH Notice 2013-15 provides that PHAs may adopt a preference specifically for the Coordinated Entry system as it is not disability specific.
- Streamlines referral to waiting list
- Families are already documented as experiencing homelessness; and ,
- Ensures that households referred have the highest need for a long-term subsidy at that point in time.

Move-On Preference

- What CoCs can provide:
 - ▶ **Pre-screening & Assessment-** Referring stable program participants with a history of paying rent on time
 - ▶ **Application, housing navigation, and lease-up support:**
 - Expedited application and income verification processes (documentation readily available from PSH/RRH program)
 - Coordinating Transition-in-place arrangements where possible
 - Acting as liaison between PHA and Landlord
 - **Preparation, transition, and aftercare supports**
- ▶ Resource Available at: <https://files.hudexchange.info/resources/documents/PHA-Moving-On-How-To-Guide.pdf>

Housing Search and Landlord Engagement



Common Landlord Interests

- Do the households come with supportive services?
- How fast will I get qualified referrals for my vacant units?
- How and when will I receive payment each month?
- Who do I call if there are tenancy issues?



Administrative Strategies

- Single point of contact
- Flexibility with check runs
- Prioritizing Mainstream Voucher inspections
- Maintain a list of landlords who have and/or want to work with PHA - free advertising for them!
- Contract/MOU with services partners
- Contract/MOU with mediation services in area



Community-wide Strategies

- Landlord risk mitigation funds
 - ▶ Damages, vacancy payments, sign-on bonuses, unpaid rent, legal fees, etc.
- Engage local leaders and politicians in landlord outreach
- Landlord appreciation



Landlord Mitigation/Guarantee Programs

- [Engaging & Supporting Landlords through Risk Mitigation Funds](#)
- [Fact Sheet: Housing Choice Landlord Guarantee Program](#)
- [Landlord Engagement & Recruitment Additional Resources](#)
- [Landlord Risk Mitigation Funds: A Literature and Design Review](#)

Housing Search – Reasonable Accommodations

- Reasonable accommodation = change in a policy or practice to ensure a person with a disability has equal opportunity to participate in a program
- PHA's must provide reasonable accommodations
 - ▶ Housing search time
 - ▶ Payment standards
 - ▶ Bedroom size
 - ▶ Assistance locating accessible units
- Owners must provide reasonable accommodations
 - ▶ Poor tenancy history if disability related and reasonable

Additional Leasing Strategies

Project-basing Vouchers

- PHAs should consider Project-basing vouchers to increase lease-up rates- especially in high cost/low vacancy markets
- HUD PBV [web page](#) provides extensive up-to-date information
- PHA allowed to project-base up to 20% of its authorized units generally, and under some conditions — the PHA may project-base an additional 10%, for a total of 30% of authorized units. (See [PIH Notice 2017-21](#) for more guidance and details.)

Using PBV for Housing for People with Disabilities (1 of 2)

- Baltimore, Maryland – HACB seeks 200 wheelchair accessible 1,2 and 3 bedroom units
 - ▶ <https://www.habc.org/media/2424/habc-rfp-b-1922-20-project-based-voucher-units-and-project-based-voucher-long-term-affordable-units-1.pdf>
- Louisiana – LHC has developed 2,000 units of permanent supportive housing for people with disabilities who are experiencing homelessness or living in institutional settings
 - ▶ <https://www.lhc.la.gov/resources-for-rental-opportunities?description=&type=7>

Using PBV for Housing for People with Disabilities (2 of 2)

- Rhode Island – RIH developed 1,609 PBV for households who are elderly, homeless, and/or have disabilities
 - ▶ <https://www.csh.org/wp-content/uploads/2014/02/CSH-PHA-Profile-RhodeIslandHousing-FINAL.pdf>
- Columbus, Ohio - The CMHA has developed 1,850 PBV for supportive housing for people with multiple barriers to housing, including elderly, persons with disabilities, chronically mentally ill, and homeless individuals and families
 - ▶ <https://d155kunxf1aozz.cloudfront.net/wp-content/uploads/2014/11/CSH-PHA-Profile-Columbus-FINAL.pdf>



COVID-19 Waivers

Requirement	Waiver	Waiver Applicability	Waiver Reference
Initial Lease Term: Voucher participants must enter into an initial lease term with the owner for one year unless PHA determines a shorter term would improve housing opportunities for the tenant and the shorter term is a prevailing market practice . See 24 CFR 982.309(a)(2)(ii).	PHA may enter initial lease terms of less than one year regardless of whether the shorter lease term is a prevailing market practice.	Mainstream Only	Notice PIH 2020-22: https://www.hud.gov/sites/dfiles/OCHCO/documents/2020-22pihn.pdf
Criminal background screening: PHAs are required to apply the same criminal background screening process to all HCV participants. See 24 CFR 982.206(a)(2).	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).	Mainstream Only	Notice PIH 2020-22: https://www.hud.gov/sites/dfiles/OCHCO/documents/2020-22pihn.pdf
Mainstream Age Eligibility: 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).	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.	Mainstream Only	Notice PIH 2020-22: https://www.hud.gov/sites/dfiles/OCHCO/documents/2020-22pihn.pdf
Waiting List Public Notice: 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).	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).	HCV	NOTICE PIH 2020-13: https://www.hud.gov/sites/dfiles/PIH/documents/ATT-SECOND-WAIVER-NOTICE.pdf

*The waivers noted above are set to expire on December 31, 2020.

Reminders

- ▶ Next webinar: *Leasing during COVID-19*- December 14th at 1pm
<https://www.hudexchange.info/trainings/courses/mainstream-vouchers-leasing-during-covid-19-webinar/>
- ▶ Webinar recordings and materials will be posted to HUD Exchange
 - Mainstream Voucher Basics-
<https://www.hudexchange.info/trainings/courses/mainstream-voucher-program-webinar/>

Questions?

