Mainstream Voucher NOFA Preferences and Strategies Webinar 11-18-20

LIZ STEWART: The agenda for today-- after we do introductions and welcome, we're going to give a brief overview of mainstream vouchers. Then we're going to dive into more details, which is really the focus of this webinar, "The Mainstream NOFA Preferences: An Overview of Waiting List Management," and then outline some specific strategies to serve target populations, and then we'll also have a Q&A at the end. And we'll have a Q&A at the midpoint as well, so again, you can continue to submit questions in the Q&A box.

I'd like to hand it over to Ashley Matthews at HUD. She's going to talk about this series.

ASHLEY MATTHEWS: Everyone. My name is Ashley Matthews, and I am a senior housing program specialist at HUD, and I'm the lead for mainstream vouchers. I'm really happy to be here today with the Technical Assistance Collaborative to provide this webinar on NOFA preferences and strategies for targeting certain populations. This is probably the topic that we get the most questions about, so we're really excited to have this resource available for everyone.

And so just to recap the webinar series, we had our first webinar in this three-part series last month. That's actually now available. If you weren't able to attend before, you can now watch the whole recording, and we have the slides available as well on HUD Exchange. And we're working on getting the link to this on our mainstream web page, so it's accessible for everyone.

Today, of course, we're doing mainstream NOFA preferences and strategies for target populations, and then next month, we will be having our last webinar in the series on leasing during COVID-19. We have so many new mainstream vouchers out available, and so we thought it would be helpful to really focus on how to get leasing done at this time. And then coming up in the late winter and early spring, we're hoping to start up our community of practice opportunity, where PHAs that are similar in nature will be able to group together and get technical assistance as a group. So we'll have more information about that in the coming months.

And so with that, I will be around to answer questions a few times during the presentation. So please put your questions into the chat box, and we'll try and get your answers. And thank you, and I'll turn it back over to Liz.

LIZ STEWART: Thanks, Ashley. And real quick, again, I'm Liz Stewart, Technical Assistance Collaborative. We are a nonprofit consulting firm out of Boston, Mass, and we have a contract with HUD to assist with this webinar series and the community of practice. We are a national TA provider, so not only familiar with mainstream vouchers that we're discussing today, but also the CoC program. We do a lot of work with veterans, so we're hoping that we can provide our expertise throughout this series and the community of practice that we'll be doing in the late winter, early spring.

I'd also like to give Lisa Sloane an opportunity to introduce herself.

LISA SLOANE: Hi, y'all. Happy to be with you again, and working on this program with Liz and all of you to get those vouchers leased up as quickly as possible.

LIZ STEWART: OK, now I'd like to just get a sense of who is here today. Ari, can I go ahead and have you bring up this first poll? It's a poll with two questions. The first is outlining what your role is. If it's not one of those first choices, you can choose Other Role, and then put in the chat box what your role actually is. And then if you are a PHA staff person and a PHA who's had a recent mainstream voucher award, please outline what, if any, preferences you establish. And you can choose all that apply. And Ari, when it looks like we have a good number of responses, just go ahead and publish those results.

OK, can you publish those results, Ari? I can't see anything yet. OK, great. Thanks. OK, so as you can see here, the poll results. So majority of folks are part of the PHA, about 55% in the management role, 32% other PHA staff, and 8% PHA executive director. So this webinar is going to be great for you all to really make sure that you are aware of what the requirements are for implementing any of the preferences that you have established.

And when we look at the second poll, we see that there's-- across the board, a lot of the preferences have been established with PHAs, the most being those that are currently experiencing homelessness at 76%, 68% at risk of homelessness, 42% for those transitioning out of institutions, 37% at risk of institutionalization, and 34% for formerly homeless and currently in PSH, Rapid Rehousing.

So we're hoping that the information that we provide today is going to help you to ensure that you are able to serve those target populations that you have established.

So now we're going to go into providing an overview of the mainstream vouchers. Just want to ensure that everyone on the call is clear about the basic requirements of mainstream vouchers, and those are outlined here on the slide. Mainstream vouchers serve households that include a non-elderly person with disabilities, and that is defined as any family that includes a person with disabilities who is at least 18 years old and not yet 62 years old at the time of admission. The assistance can be either tenant-based or project-based rental assistance.

And while mainstream vouchers assist a special population, it is important to remember that mainstream vouchers follow the same program policies as the regular tenant-based voucher program. However, the funding and financial reporting of mainstream vouchers are separate. And we go into more details on the basic requirements as part of our first webinar, so if you weren't able to attend that, then I'd suggest making sure that you go ahead and take a look at that on the HUD exchange.

Aside from the separate funding appropriations and serving a specific population, mainstream vouchers are administered the same as regular voucher assistance in that mainstream vouchers are regulated under the same program requirements as a housing choice voucher program. So those same regulations, that 24 Part 982 and 983, apply to mainstream vouchers. There is no special authority to treat families that receive a mainstream voucher differently from other applicants and participants of the housing choice voucher program. So for example, the PHA cannot apply different payment standards. It cannot establish conditions for allowing portability or different screening criteria for mainstream voucher families from regular housing choice voucher families.

There are some specific HUD notices, though, that we want to make sure that you're aware of that relate specifically to mainstream vouchers. There is PIH Notice 2020-01, which provides updated policies related to the mainstream voucher program. And this notice supersedes any prior notices that provided guidance related to the mainstream voucher program. So you want to make sure that you are looking at the requirements set of the policies that are specified there.

PIH Notice 2020-09-- this was published back in May and authorized a 30% increase in mainstream units in budget authority for those PHAs awarded in FY '17 and FY '19. And for those of you that got those awards, you would have seen that increase in an award letter already. And then there is the most recent notice, which was PIH Notice 2020-22, and this was published in September.

And it provides a non-competitive opportunity for mainstream vouchers and the opportunities for \$150 million for mainstream vouchers. It is a rolling application process for this opportunity with the applications due no later than December 31, 2020. So be aware of that deadline if you have not applied and you're thinking of doing so.

Some awards for this opportunity were actually just announced yesterday, so some of you may have already received that announcement yesterday. In addition to the funding opportunity that's outlined in this notice, it also outlines specific waivers the PHA can implement for the mainstream vouchers in response to COVID-19. And we will discuss those a bit towards the end of this webinar.

Lastly, just want to put a plug in for looking at the PIH mainstream voucher page. There are a ton of resources and information there, including the FY 17 NOFA FAQs and FY 19 NOFA Q&A.

OK, now that we provided an overview of mainstream vouchers, we're going to move into-- the focus into the mainstream NOFA preferences and how preferences work. While not a requirement to receive funding under the mainstream NOFAs, HUD provided additional points to PHAs that target funds to assist non-elderly persons with disabilities in these five target groups, which include people who are transitioning out of institutional or segregated settings, at risk of institutionalization, currently experiencing homelessness, at risk of becoming homeless, and those who previously experienced homelessness and are currently a client in permanent supportive housing or rapid rehousing project. And that last category was added in the FY 19 NOFA, and that's what the asterisk identifies there.

So HUD worked with the Federal Department of Health and Human Services to develop the FY 17 NOFA in order to further the goals of the Americans with Disabilities Act and to help people with disabilities live in the most integrated settings. For the FY 19 NOFA, in addition to furthering the goals of the ADA, HUD wanted to support the goals of Home Together, and that is the federal strategic plan to prevent and end homelessness. And this is where that fifth preference was added in the FY 19 NOFA.

So for many of you on this call, when you apply for either the FY 17 or the FY 19 NOFA, you outline which preference or preferences you are committing to. In addition, while the FY 20 notice that I just talked about earlier does not specifically incentivize preferences, HUD is encouraging you to work with your local partners to use those vouchers to address an overall community housing plan, which may include addressing the needs of these groups.

When establishing any of the NOFA preferences, it is important to be clear on how the target populations are defined. Within the FY 17 and FY 19 NOFAs, definitions of the target populations were provided that PHAs could use as a guide. These definitions primarily follow existing definitions outlined in other federal regulations. So for example, the definition of "homeless" that is provided in both the FY 17 and FY 19 NOFA pretty much follow what is outlined in the McKinney-Vento Act as amended by HEARTH. So for those of you that work closely with CoCs, like you're probably very familiar with those-- with that definition of "homeless."

While PHAs can choose to adopt these definitions, they may also choose to use applicable local or state definitions, if available, as long as the persons who fall under the local definitions of the target populations also meet the eligibility requirements of mainstream vouchers, meaning that the household includes a non-elderly person with a disability. And regarding verification of preference, HUD does not have the specific requirements for verifying preference eligibility, but PHA should follow the verification hierarchy. For example, third party verification of preference eligibility should be sought first before moving to a lower standard. But again, HUD does allow for flexibility in how you determine how you'll verify the preference eligibility, and we'll be talking around strategies around documentation later in this webinar.

Now that we've outlined the NOFA preferences, I'd like to provide more general information about preferences and how they work. Preferences affect the order in which families on the waiting list receive assistance. Any preferences you adopt have to be included in your admin plan. And in selecting and drafting specific language for your preferences, you really need to be sure that the preferences don't exclude people with certain disabilities from accessing assistance or violate other Fair Housing laws or civil right laws. It is important to highlight that any preferences established will apply to your housing choice voucher program, and the PHA is not allowed to apply the preference to mainstream vouchers only.

If a PHA-- sorry, the PHA can choose to open the waiting list only for certain preferences but must give public notice when opening the waiting list. And there is currently a waiver in place around the public notice requirement, and we'll talk a little bit more about that later.

So in addition to the general preference requirements that we just talked about, there are a number of options related to preferences that PHAs can implement. One of these options is to have a limited preference that only serves a certain number of applicants. For example, you may draft a preference that's included in your policies and procedures in your admin plan that says, we will provide preference for up to 50 people who are experiencing homelessness.

So you can have a limitation or a cap, and within that cap, you can outline whether it's going to be a one-time limit that ends once the 50 families are served or an ongoing limit that allows 50 families to be served at any given time. So upon turnover, if you have 50 families currently utilizing the vouchers, and someone leaves the program, then you could choose to reissue that if that's what your policy is. Or you could have

that once 50 families are leased off in those vouchers, that the preference expires and it ends. So there's different ways of doing that.

Another option to highlight is that PHAs can choose to target the assistance to only one of the NOFA-targeted groups. For example, you can adopt a preference only for those transitioning out of institutional or other segregated settings. But it is really important to note that if you received an award in FY 17 or 19 or from a NOFA in which you claim points for a preference, you must adopt a preference for at least one of the targeted groups in NOFA. So it's a "may" for housing authorities that want to do this, but it's a "must" for housing authorities that receive funding through the NOFA and claim preference points.

If you've got the points, then you have to do at least one. But HUD has said if you outlined in your application that you're going to serve two of the targeted groups, and now you realize it's more practical to focus on one group, you are allowed to do only that one group as long as you are at least targeting your assistance, giving a preference for one of those groups. You can also waive and layer your preference preference using points.

So for example, if you have a preference for people who live or work in the community, maybe you give two points for that in your policies, and now you're adding a preference for people who are homeless, and you decide to give three points for that preference. So if someone is both a resident in your community and experiencing homelessness, they would have five points and may get more preference over someone who is just a resident in the community.

Another option for housing authorities in reference to your preferences relates to referrals from other community organizations. Housing authorities cannot have a preference specifically for referrals from organizations that exclusively serve people with certain types of disabilities. For example, you cannot accept preferences only from your local mental health authority. That would be considered a violation of the regulations. However, if you review PIH Notice 2013-15, that notice provides and you can adopt a preference specifically for your Continuum of Care coordinated entry system, because that system is not disability-specific. Again, this preference, as we said before, can be layered on other preferences as well.

So let's take a look at some of the FAQs from HUD and see how you all would answer some of these questions. So this first question relates to PHA's choice of preferences. And the PHA asked, "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'm not sure how we would target that area."

So we're going to make this question into a poll. So Ari, could you go ahead and bring up poll number two? And the question I want you all to try to answer is, can a PHA choose to target only populations who are homeless/at risk of becoming homeless? So the options are yes, no, and I don't know.

OK, whenever that looks like there's a good amount of responses, you can go ahead and share those results. OK, so 77% said yes. Some of you said no. And a portion of you were not sure. For the majority of you, the answer was correct. It is yes.

In the FAQs, the answer specifically says, 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. So again, as we said earlier, you don't have to provide a preference for all of the different targeted groups identified.

You can only target one of those groups, and that is OK. And that is because the way the scoring worked in the NOFAs, it didn't give any more points for serving more than one target population group. So HUD has stated that as long as you-- if you got points in the NOFA, as long as you are serving at least one of those target populations, then you are OK. And again, you'd need to make sure that is all outlined clearly in your admin plan.

OK, let's do another one. So Ari, if you could go ahead and bring up-- well, actually, first, let me go ahead and read this question. So question from the PHA-- "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 permanent supportive housing or alternatively, to non-elderly persons with disabilities who are currently a client in a rapid rehousing project?"

So they're essentially asking, is it possible to just do one and not do both? And we're going to go ahead and put that question to you all. Ari, you can go ahead and do poll number three. The question is, are PHAs allowed to limit the move-on preference, as they call it, to solely non-elderly persons with disabilities who are currently a client in a permanent supportive housing? And the options are yes, no, and I don't know.

You want to go ahead and share the results when it makes sense? OK, so we're seeing some more mixed responses here. So the answer-- are PHAs allowed to limit the

move-on preference to either one of the other categories, is actually yes, you can do that. And this is actually the way the question is answered in the FAQs, just an [INAUDIBLE]. Yes.

So strategically speaking, there might be a reason why you want to limit to maybe those who are currently a client in PSH versus those in rapid rehousing project and vice versa. So you are able to establish one or the other, and you would be meeting your obligation under the NOFA preference requirement, if you applied for that.

OK, now I'm going to go ahead and hand it over to Lisa to talk about waiting list management in the context of preferences.

LISA SLOANE: Thanks very much, Liz. So I'm going to review some of the concepts that we had in the first webinar, if you participated in that, and build on those. So this slide highlights some of the key waiting list administration requirements and certainly some of the requirements that HUD has received a lot of questions about. So first, according to the regulations, housing authorities must maintain one single waiting list for all tenant-based assistance, including mainstream voucher assistance. So mainstream voucher is a targeted form of housing choice voucher, but it's really, as Liz said initially, it's covered by all the same-- most of the same regulations. And one of them is to be part of the single waiting list system.

Housing authorities can limit the number of people who qualify for preference. You might think of this as sort of capping a preference, and we're going to give some examples in a little while. Housing agencies can adopt criteria, such as preferences, defining which families can apply for assistance when opening their waiting lists. So as we go through and talk about some of the scenarios under which you can adopt preferences, you can-- these are some of the criteria that are meant by the regulation or allowed.

Housing authorities, housing agencies have to have written policies for how preferences would be applied, and these usually can be found in your admin plan. And housing agencies, as was indicated a few minutes ago, must adopt a preference for one or more of the targeted groups listed in the NOFA if this is what you claimed in your NOFA application, so the FY 17 and FY 19 NOFAs. If you received funding under those, and you claim to preference, you have to select at least one. And as Liz said earlier, HUD has said if you selected more than one, you can back off into a single.

Next slide, please. So as-- when you receive these vouchers, some of the housing agencies may have realized that they had their list-- it's been closed for a long time, and they really need to do a waiting list update. If there's a change in eligible population, we have to figure out whether the housing agency will do a full waiting

list update or what's called a limited update. A full or limited update can be done regardless of whether the housing agency will be opening the waiting list or not.

So first, we'll talk briefly about the full waiting list update. And this update is going to be required if you're establishing a new preference. So if you do not have a move-in preference already, and that's a preference that you want to do, the one we just talked about, move-in for people coming from permanent supportive housing, then HUD will require that you update the entire existing waiting list to determine if any of the current applicants meet the eligibility criteria for mainstream vouchers and the new preference. Next slide, please.

Whoops, thanks. If-- but if-- you could also do a limited waiting list if you're not adopting a new preference. So that's a situation in which you can do this. And here's an example. You are allowed to determine eligibility of-- excuse me-- existing families on the waiting list in smaller batches. For example, you 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 and, of course, applying the preferences, if that's what you're doing. Next slide, please.

So we've got a couple of poll questions using the poll feature again. And if you're not able to use the poll for some reason, you can keep track and give yourself a score. So here's the first one, and these all relate to waiting lists and preferences.

So a housing agency asks, "We've had a difficult time leasing mainstream vouchers that we were awarded in 2018, so we're not sure if we're ready to apply for any more vouchers. We established a limited preference in accordance with the NOFA for 25 families. However, we've only been able to lease up three families under this preference. We don't 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?"

Ari, can you please pull up the poll? So here are the options for you to select. Option one is, hold off on issuing the mainstream vouchers until a household or households are identified that meet both the preference and mainstream eligibility criteria. The second choice is, move forward with issuing the mainstream vouchers to households who meet the mainstream eligibility criteria, which, you may recall, are age and income and disability, even though they do not meet the preference criteria. And the third option is, I'm not sure. So let's give everyone a few seconds to select the answer that they think to this question.

And Ari, just post, please, the responses when you think we've had the same numbers we've had in other polls. Thank you. OK, so 23% of you, of the folks responding,

thought that the first question was-- the first answer was correct. 68% of you said the second answer was correct, moving forward. And 9% of you said, I'm not sure. So Ari, please close the poll, and you can see that those of you who picked the second question are correct.

The housing authority is required to make a good faith effort to recruit families that meet the preference criteria. If the agency cannot find families that meet the preference criteria, the voucher may go to the next eligible family on the waiting list, which would be a family that includes at least one non-elderly person with disabilities. We have another about using the Coordinated Entry System, or CES, which, as Liz explained, is the continuum of care's system for managing their resources.

So, "HUD guidance states that PHAs cannot develop direct referral partnerships. Is a preference for persons experiencing homelessness who are referred by a CoC's coordinated entry system not considered a direct referral? Please clarify."

OK, so Ari, so you can pick that this is the preference, so the true or false. A preference-- so is this allowed or not allowed? If you believe that a referral from coordinating entry is allowed, pick True, and if you feel like it is not, please put False. A preference for persons referred by CES is a specific instance where a direct referral preference may be allowable, because coordinated entry systems typically do not base assistance on disability type. True or false, or you're not sure. So Ari, when you feel like there are-- most people have answered, and it's slowed down, please post.

OK, 71% of you said you believe this is true. 12% said false. 18%, I'm not sure. It's kind of a confusing area. And the answer is, true. As Liz talked about earlier, some organizations only serve people with certain types of disabilities. These organizations may refer applicants.

However, the PHA may not establish a preference specifically for referrals from an organization, organizations that limit their services based on disability types. The NOFA encouraged housing agencies to partner with these organizations, because-such as coordinated entry, CoCs-- because they're critical to assisting people with disabilities. However, PHAs may not set up exclusive referral partnerships with these organizations, disability-specific organizations.

And as Liz mentioned, Notice 2013-15 describes a specific instance where a direct referral preference may be allowable without violating Fair Housing laws, because the Continuum of Care, coordinated entry systems, or CES, typically do not base assistance on disability type. Housing agency may use the guidance provided in the notice to structure a referral preference. However, the housing agency must still ensure that Fair Housing laws are not violated. Housing authorities still must follow

the regulations on waiting list administration and program admissions, including the requirement to use the waiting list for admissions.

So it's a lot of information to go over. Ashley, next-- I'm going to pass it over to Ashley Matthews from HUD, who is going to-- has been looking at some of your questions and is going to respond.

ASHLEY MATTHEWS: All right, so we have a little break for questions. So I've received a lot of questions. I've answered a lot of them in the Q&A already. One question is, do we-- "Can we just have a preference for those who are non-elderly disabled?" So you don't need to do that. You know, as we've talked about before, you're only required to have a preference if you applied for funding and claimed that you were going to have a preference in the 2017/2019 NOFAs. You may still decide that you-- if you're getting funding through the CARES Act authorized funding, you may still decide that you want to have a preference. That's fine. But if this is the first time you are having mainstream vouchers, you do not need to have a preference for the mainstream eligibility criteria.

When you have a mainstream voucher to lease, what you'll do is issue that mainstream voucher to the first mainstream eligible family on your waiting list. So there's one waiting list, one HCV waiting list. You go to the first family on your waiting list that is eligible for mainstream. So you may find that you already have plenty of mainstream eligible families on your waiting list, which is fine.

You don't need to open it, then. You can work your current waiting list, if you're not adopting a preference. An issue to that first-- you don't have to make any kind of updates to your admin plan in order to do that. This is a-- it's by law that mainstream serves families that include a non-elderly person with disabilities.

Let's see. What other questions did we get? Someone asks, "Can we identify families that meet the criteria on our HCV waiting list and issue a mainstream voucher as long as they now meet the criteria?"

Absolutely. That's really what you should be doing. You know, you're issuing mainstream vouchers to those who are eligible on your voucher waiting list. If you--obviously, you can open your waiting list to get new families. You can add a preference and try to recruit new families that meet that preference. And obviously, they would be going to the top of the waiting list. So that's fine, but you also-- no matter what, you're serving the first family that's mainstream eligible on your waiting list. Let's see what else.

If we already have a mainstream waiting list with a homeless preference from the fiscal year 2019 NOFA, and we receive additional mainstream vouchers in 2020, will we need to issue the new mainstream vouchers to the current waiting list applicants before opening up the waiting list? I would say that this is your call. I think that when you have a preference in place, it always makes sense to be recruiting for that preference. You have to have your waiting list open in order to accept new applicants, so it would make perfect sense to open your waiting list and try to get more applicants that meet that preference.

But that's going to really be up to you based on how many people you have on your waiting list to serve and how valuable you feel that preference is to your community and kind of the situation that you are in and how many families that are eligible that are still on your waiting list. So I wouldn't say that there's a hard and fast rule that you have to exhaust your current eligible mainstream people before you open. That's not necessary.

All right, let me find one more question. Let's see. If you adopt the new preference, can you do the waiting list update over time due to the size of the waiting list? So we've answered a question similar to this. If you have-- in the FAQs-- if you have a really large waiting list, and you're adding a new preference, it makes sense to make some sort of announcement or send a mailing, some sort of notification to those people who are on your waiting list, letting them know about the new preference to find out if they are eligible for it.

If-- and you give them a time, like, please respond by this point, and let us know that you're eligible. If they come in after that deadline, you would still give them the preference. But I think there are ways of doing this in a bulk manner that doesn't involve calling every family on your current waiting list.

But I think with preferences, the problem is you kind of do have to all at least attempt to update the list all at once, because you're going to have served a bunch of people. If you haven't let a bunch of the people on the waiting list know there's this preference opportunity, then they wouldn't have had a chance to get their proper spot in line. So that's why the timing is more important with that.

OK, I don't know. How long have I taken on questions yet?

LIZ STEWART: I think we're-- I think we should move on to the next section, Ashley.

ASHLEY MATTHEWS: Okay. All right. Sounds good.

LIZ STEWART: We'll have time at the end, so we can get back to questions that have been submitted, if we have time, for sure.

ASHLEY MATTHEWS: Great. Sounds good.

LIZ STEWART: OK, Lisa, I think you're going to start us off on strategies.

LISA SLOANE: Yes. So we're going to move away a little bit from the specific parameters of the regulations to talk about some strategies, some operational things that you can do to serve your target populations and, hopefully, to get your vouchers utilized and leasing up and helping these target populations who are really in need of housing as quickly as possible. Next slide, please.

So this slide sort of shows you, you know, one version of the steps that one has to go through in finding-- getting an eligible applicant from outreach to move-in. There are a lot of steps-- selection, eligibility, briefing, housing search, inspection, lease up, lot of -- It's-- your voucher program, in some ways, is a very elegant program, but there are many steps involved. And some housing agencies have found it difficult to get to the goal line, to move-in, to high utilization in a timely manner. And there are a lot of reasons for that.

Some agencies had a hard time identifying target population. People weren't on the list, or they were on the waiting list but not identifiable, because there hadn't been a question like homelessness on the application. Some of these-- some folks in some of these targeted populations have some challenges securing the required documentation in a really timely manner. Many of you have expensive markets, housing markets, so housing search is difficult.

Some of you in rural areas don't have enough stock, and that makes things difficult. Target populations may need assistance with housing search. They may not drive. You may not have a lot of public transportation. During COVID, it's been hard to see units. Some folks have difficult tenancy records or criminal records that make it difficult either at your end or at the lease up with the landlords.

So many of these target populations don't-- are not in a position to save money for a security deposit. If you're homeless, living on the street, you probably don't have a lot of money in a savings account. And the same thing would be true for many people who are living in institutional settings. So next slide, please.

So there are a lot of challenges. And that's why HUD has really been hoping through this program that you would develop local partnerships, partnerships with organizations that work with the target population so that the challenges that some of you face in these many steps from outreach to move-in, you can get some help with. Examples would be Continuum of Care, Continuums of Care. These are-- we're going to talk about them a little bit more in a second, so if you're not familiar with them. Centers for independent living-- service providers for various populations could be service providers for people with serious mental illness or people with intellectual and developmental disabilities or other homeless service providers or other community partners.

Apart from the largest housing authorities, most housing agencies are going to need partners to make this program work for the target populations, especially if you have a tight market. So we're going to do a quick poll in the next slide to get a sense of which partners, if any, you all have had. And so Ari's going to pull up the poll. I believe you can check all that apply. So check off any partnerships that you have currently or are in the middle of developing for this program.

How's it looking, Ari?

ARI: I think just maybe a couple more seconds, and then I'll go ahead and share results.

LISA SLOANE: Thank you. OK, so 73% of you said that you have partnerships with the CoC. 19% of you said with centers for independent living. 49% of you said you have partnerships with a service provider. 59% of you said you have partnerships with a homeless provider. 18% of you said you have other kinds of partnerships. And 11% of you said that you have not yet intentionally partnered with an agency.

It's sort of interesting. I wrote down-- I kept notes earlier on how many of you said--what percentage of you said you dealt with which target population. And 76% of you said that you had one of your target populations was people who were homeless, and that matches quite well with the fact that 73% of you are partners-- said you have partnerships with Continuums of Care, because they are responsible in their regions for homeless planning.

So it sounds like a lot of you have really tried to develop those partnerships that will help you with implementation. Next slide, please. So let's just talk a little bit about the kinds of things that we've seen or that are requiring partner support or where you can find partner support to be very helpful. And so here's a list of some of those areas.

Outreach-- so who's going to be identifying people in the target populations? I think some of you know that you have a lot of people already on your waiting list in the target population. If you have a homeless preference, and you've had your waiting list open anywhere near recently, you probably had a lot of people already apply. But

some of you have, in the questions that HUD has received, you haven't been able to identify people in the target population. So you maybe have a different target population, or you're in an area, or you really need a partner to help you with that piece.

At the application phase, how are applicants assisted in securing documentation? Again, people need to document disability. They need to document income for people who are in institutional settings or on the streets, they may not have carrying with them the documentation. And they will need assistance securing that, and that's not a typical housing authority activity. And so a partner can really be helpful with that. We've already talked a little bit about housing search, and that includes not just-- so includes identifying a unit and includes getting to see a unit, potentially, whether that's a remote activity or a real activity in your community, and negotiating with owners or the property management company.

Many of the folks in the target population, when I look back, 42% of you said you had selected people with disabilities who are in institutions. 76% of you said people who are homeless or at risk of homelessness. So people who are homeless are not necessarily in a great position to do housing search, or people who are in an institution, especially now, there are limitations to going in-- because of COVID, going in and out of institutions that have-- can be challenging.

But a-- we have some examples in a second of providers and partners, who can be helping participants with that. Because again, typically, housing searches in most housing agencies have really limited assistance in that area. I bet many of you can give out a list of accessible apartments or where accessible apartments can be found or a list of landlords that you have-- typically have a relationship with in the voucher program.

But that list isn't going to get somebody to see a unit or talk to an owner, especially if they have not great ex-- not a lot of experience doing that or not a lot of success in the past. So again, a partnership activity. Move-in. As we said before, people who are experiencing homelessness or coming from an institution, they probably don't have funds for security deposit. They haven't stored furniture most of the time. These are many of your partners in the community, whether it's a disability-specific organization, a CoC, a homeless provider. They will-- this is a problem they typically face, and so they have a way-- either a pool of funds, or they know of ways that folks can get help with these activities.

Supports-- remember that supports are voluntary in this program, but many folks will need community-based services in order to have successful tenancies, especially in the beginning. Again, services are voluntary, but they have to be available. And best

practice partners will be really good at trying to engage people. So some of the same folks who may be helping you with outreach may be the same providers who will be doing supports in your community. Next slide, please.

So we just talked about, what are the kinds of things that partners can potentially help you with? And we'll talk about, in a second, some of the partners. But before that, Liz and I work on a number of different programs that involve state or local level partnerships. Every partnership is unique, but there are some commonalities. And we feel like we have some lessons learned to make that partnership kind of effective. And some of these may seem really obvious to you, but I think sometimes we're so caught up in the activity, we have a hard time being very intentional. And so we encourage you to be intentional in the areas that are listed here.

It'll help your partnership, I think, be more effective. One is meet regularly and as often as needed. All of you are very busy, and your partners are very busy, but if you know that every Monday morning at 10 o'clock for a half hour, you're going to do the check-in on your program, making sure you know what's happening with the 10 people who are currently trying to lease-- have been issued vouchers and are trying to lease up, then that's going to be on someone's calendar. They'll get used to it. They won't fill it in with other things, and you will as well, all the key people in your agency.

And we find that if you have regular meetings, it can really help move the program along and make the partnership work effectively. You know, at some point, you may not need to meet as often. Initially, you might need to meet weekly, and then a year later, maybe only monthly to do a check-in. So you'll be able to manage that. You want to establish clear roles and responsibilities. Who is going to reach out to the landlords? Is that something that the housing agency wants to do, or is that something you want service partners to do? Different communities would want to do it differently. And so that's something we want to be clear about.

Engage in level-setting. Don't assume your partners know what's important to you. I'm sure you all get a lot of complaints about collecting documentation and some of the specificity that's needed. But some of your service partners may not understand the requirements that you work under and why you have-- you're asking them to do something a certain way. So engaging in level-setting, so they understand you're not just trying to be difficult and make it hard for people, but you're trying to make sure that you get more vouchers in the future, because you had a really good audit when people came and looked at your files, that you collected the information you're supposed to.

Setting goals-- I don't know how many of you have heard of, like, 100-day challenges to ending veteran homelessness, for example. Those kinds of activities, those 100-day challenges have been very successful. And part of the reason is because everyone commits to a goal, and they all-- they set their minds to it, and they work together towards it. There are clear roles and responsibilities. So having those kinds of time frames and goals and metrics can not just be good documentation of your success, but really help people work together towards those goals.

Think about using a written memorandum of understanding, or MOU. It doesn't have to be formal, but we think a written document helps people in a number of levels, remembering their roles, and just the process of writing down, putting the MOU together, and agreeing on the language, and it really helps to do that kind of oral clarification. And sometimes over the life of a program, there are-- there's staff turnover. Somebody changes jobs in the organization, and having that MOU will remind the agency that they've made a commitment to this partnership. And even if Sally's moving on to a new job, they need to help-- they need to find someone else for that slot to help you in program implementation. Excuse me.

You might need to expand partnerships over time. If you add a new population, you'll need a new partner for maybe there's something you didn't realize. You didn't realize applicants would have as many children as they do. And so that may mean you want to add a family service agency that you didn't have in the beginning. So those are some of our ideas for best practice kind of partnerships. Partnerships are important, and setting them up and managing them, even though it takes time, will kind of-- in the end, would make it more efficient for you.

So let's turn and look at some specific examples of mainstream voucher partnerships that we think can be successful, can help you out, that we've seen very workable. So let's talk about-- the first partners I want to talk about are Money Follows the Person, or MFP programs, and Centers for Independent Living. So Money Follows the Person program, it exists in about 40 states. And I want to point out those programs just got a big infusion of funding that they may be looking for activities to do.

So those programs and in-- every state has a center for independent living. MFP programs are usually state level programs that work with your county Medicaid programs that help people with disabilities transition from nursing facilities. The Centers for Independent Living are community-based organizations, nonprofit that help people with disabilities in a variety of ways. But one of the things they do is help people transition from institutions.

Both of these organizations are specifically working with people with disabilities who kind of raised their hands and said they want to move into the community. So these

organizations have a pipeline of folks. If one of your preferences that you're interested in serving is helping people transition from institutions, these organizations can really help you with that, because they have kind of a pipeline of folks ready to go.

They can also help you access some of the resources that we talked about in previous slides. So MFP programs can offer one-time community transition costs, like move-in, security deposit. They provide what we call pre-tenancy and tenancy support, so supports during the transition period as well as ongoing tenancy supports to help people live successfully and be good tenants in the community.

MFP programs usually offer home access modifications for people with physical disabilities, and then there are some other state level activities sometimes that may help your program. Centers for Independent Living provide what we call core services, and those can include independent living skills training, so when somebody moves into the community, if they haven't had-- been in an apartment before, understanding how to be a good tenant, taking care of their apartment, and other aspects to living successfully in the community. They have information referral. They do this transition, peer counseling, and peer supports. So these organizations can offer sort of ongoing tenancy supports as well as transition assistance.

Next slide, please. So here is an example of how you can craft a preference that you might use in your admin plan, for example, for the target population that we were just talking about, that Money Follows the Person and Centers for Independent Living can help people who are coming from institutions. So-- and one housing authority we know of provides eight points. They have a preference-- they have a number of different preference in their waiting lists. And for people who are inappropriately institutionalized, they get eight points in the system.

Well, that's one way to do it. But you could also, as we talked about before, provide a capped preference, for example, for the number of mainstream vouchers that you get for people in the same category. So the second bullet here kind of describes the categories of people, who live in institutions that you may want to use that one housing authority we've worked with uses.

So it defines as people coming from a nursing facility, intermediary care facility, or ICF, for people with developmental disabilities, for people who've been hospitalized in a psychiatric facility for longer than 14 days, other kinds of licensed residential treatment facilities, or have been incarcerated in jail or correctional facility for longer than 30 days.

So again, they have to meet all the mainstream eligibility criteria. This is just a preference for people who do meet that criteria. So let's look another at another

example of partnership. So I just want to make sure everybody knows what a Continuum of Care or CoC is, that these are basically organizational entities whose role it is to address homelessness in a self-defined region or city or county. And HUD has recognized-- HUD'S CPD division has recognized CoCs for certain kinds of funding, like HEARTH funding, Homeless Act funding.

So-- but they offer you-- also, partnership with the CoC can also help you in some of the ways that we've been talking about. They can-- for example, they can help you with utilization around target populations, if you're specifically interested in serving people who are homeless. And many of you indicated that you were interested in that.

So we've talked a lot about coordinated entry, so coordinated entry-- CoCs are required to develop a coordinated entry system, which is a way for people who are homeless to let the CoC know that they're interested in some of the resources they offer and allows the-- coordinated entry system allows the CoC to order people. Generally, people who are more vulnerable are served before people who are less vulnerable.

And right now, HUD has really encouraged these CoCs to look specifically at those people who are vulnerable to COVID and to prioritize based on, for example, age and some of those disabilities and situations that make people more vulnerable to COVID, like having diabetes, for example. So that coordinated entry system can help you identify applicants who are homeless, specifically, and those who are most vulnerable while they're homeless. It can help you with that outreach and referral component. When you-- so-- and here's some other ways that the CoC can help-- housing search, security deposit, furniture and move-in assistance, as well as ongoing supports.

So we've already talked-- next slide, please. We've already referenced some of this using coordinated entry for referrals, and the idea is that you can craft a preference specifically for people who are eligible for the mainstream program, who are experiencing homelessness and are referred by your community's coordinated entry system. And that could be an open referral, no cap, or you could cap it, if that's what you prefer to do. So we'll create a streamlined referral to the waiting list. And you get families who are already documenting, experiencing homelessness and people who are of highest need. Next slide, please.

So the last thing we'll talk about in this section before I turn it back to Liz is a moveon preference. So as many of you probably know, CoCs administer permanent supportive housing in a program called rapid rehousing. And right now, a lot of the CoCs are really expanding their rapid rehousing to help people with using CARES money to help people who are experiencing homeless get out of their situation into a-- getting into an apartment. Most rapid rehousing programs are structured kind of like, or have as part of it, a voucher program with case management services.

So what-- if you're thinking about using a move-on preference, it can be really-- it's a really nice little spot for some of you, because you're going to get referrals of people who have, whether it's from permanent supportive housing or rapid rehousing, these are stable program participants who have a history of paying rent on time already, because that's their experience in both PSH and rapid rehousing. They can really expedite your application and income verification process, because they've already done that, generally, for the PSH program. A little bit less for the rapid rehousing program, but they have done some.

And importantly, in many of these programs, you can lease in place, because an apartment is already being leased, for example, with rapid rehousing funds, likely meets your HQS requirements, if that's what you're using. And so it's a really nice little mix for-- a nice little spot. It's potentially a sweet spot for some of you who are trying to really do some quick utilization, especially if you're in a tight market where it's hard to find units right now. And you can see a link there to a resource that you can get some more information about the idea of a move-on preference.

So I'm going to hand it back to you, Liz.

LIZ STEWART: OK. Thanks, Lisa. And now we're just going to talk a little bit about strategies around housing search and landlord engagement. One of the key things that PHA can do to improve the ability of households to lease up is ensure that they have an effective landlord engagement strategy that is responsive to common landlord interests. So some of those interests are outlined here on this slide. Landlords want to know that potential tenants will have access to necessary services. They want to know that vacant units are going to be filled quickly, that payments are going to be timely, and then that there is someone that they can reach out to when there are tenant issues.

And here are some of the administrative strategies that the PHA could use to respond to these common landlord concerns. So you could establish a single point of contact at the PHA that is specific for these mainstream vouchers that deals with any of the issues that come up or answers questions that they may have about how payment works. Another key strategy is creating flexibility with check run.

So for example, instead of the checks always just going out on the 1st, if you have some interim periods throughout the month, that allows for landlords to get their rent quickly, ahead of time, that's helpful. So if the lease starts mid-month, that they don't have to wait two weeks to get the check. Prioritizing mainstream voucher inspections, so anything you can do there to ensure that inspections are timely. Obviously, right now, with COVID-19, there are some creative ways of doing inspections. Why I want to look at that, and we'll be talking more about that on the next webinar.

Maintaining a list of landlords who have or want to work with a PHA, and it's free advertising for them to know that, again, if their unit can be advertised on a public website that many people have access to, that might be good for them. And some landlords have been reluctant in the past. It's worth doing additional reach-out around advertising for them, considering that there have been some changes in market because of COVID-19 that landlords might be more apt to working with PHAs now just because of the fact that, in some areas, there actually has been a decrease in the vacancy rate.

Contracting with a service partner, so all the things that Lisa just talked about as far as those services that can be provided through service partners. It's helpful to have an MOU with them and landlords that know that there are services available to the tenants that are going to be residing in their units. And also, contracting or having an MOU you with mediation services in the area, so if things-- if issues do come about, that there's someone with that kind of level of expertise that can mediate that situation.

In addition to things that the PHA can do administrative-wise, it's also important to look at landlord engagement as part of a community-wide strategy. There is a few different things that can be done from a community-wide perspective that includes adopting or establishing a landlord risk mitigation fund that provides for damages, vacancy payments, sign-on bonuses, unpaid rent, legal fees. That obviously is a huge incentive for landlords if they know that if a tenant does move into their unit, and causes damages, that there is a fund that they can access.

One of the things that we hear out in different communities is once you establish a landlord risk mitigation fund, a lot of times, it's more of the idea of having it than actually being accessed. So even if you have \$10,000 or something for a landlord risk mitigation fund, that can actually go a long way as far as just getting buy-in from landlords. It doesn't necessarily even mean that the monies are going to be accessed.

In addition, it's really important to reach out to landlord leaders-- or sorry, local leaders and politicians as part of your landlord outreach. I think landlords really respond positively to knowing that they are maybe part of a community-wide initiative that is being spearheaded by a local politician or a local leader to feel like they're really part of a community-wide initiative. And in addition, any kind of landlord appreciation events, we typically will talk about having an awards ceremony or doing sort of like a monthly luncheon. Some of those things might not necessarily be possible right now, but maybe it's thinking through just giving out awards and

having something done via Zoom right now. But long term, having these types of events really can make a difference.

This slide just has some examples of landlord mitigation programs that you can access. Once we get the slides up, I encourage you all to check out these links, so you can get an idea, if you don't have this already in your community, sort of what the key steps are to getting a landlord mitigation and guarantee program started. And as far as housing search goes, you also want to make sure that you are taking into account reasonable accommodation, especially with the population that is being served with mainstream vouchers.

So a reasonable accommodation is any change in a policy or practice to ensure a person with a disability has equal opportunity to participate in a program. And PHAs have to provide reasonable accommodations for people with disabilities, where they can show that the reasonable accommodation is needed due to their disability for things like the housing search time that someone has to locate a unit, the payment standards that are in place. They may seek a reasonable accommodation to have a higher payment standard, may be seeking to have a higher bedroom size due to their disability, and also providing assistance locating accessible units.

On the other side of things, owners also are required to provide reasonable accommodations, and, in particular, when you're looking at screening criteria, they have to consider reasonable accommodation for core tenancy history if it is disability-related.

OK, Lisa, I'm going to have you talk a little bit about the additional leasing strategies before we open it up for additional Q&A.

LISA SLOANE: Yep, I'll just highlight some of these so that we can make sure we have time for questions. So another strategy that housing agencies can use to increase utilization is to think about project-basing vouchers. And I saw some chatter about this in the chat or the Q&A, so some of you were definitely thinking about this. You know, this will help you, especially in high cost, low vacancy markets.

When you get this slide, you'll be able to click on the web page. If you haven't googled it already, there's a lot of extensive up-to-date information. And you are allowed, as I'm sure you know, to project-base up to 20% of your units generally, and under some conditions possibly related to this program, an additional 10% for a total of 30% of your authorized units.

So the next two slides-- I know some of you probably think that project basing can be really challenging if you haven't used this option before, but many housing authorities

have used it successfully. And so the next two slides have some examples of both cities and state level balance of state programs that have used project-based vouchering specifically for housing for people with disabilities, which would be the same kind of thing that you would be doing with mainstream vouchers, potentially. So Rhode Island Housing developed over 1,600 project-based vouchers for Baltimore, so just Baltimore, Louisiana are two examples. Rhode Island and Columbus, Ohio are another two examples. So those are a couple of profiles.

We've given you a link in Baltimore. They currently have an RFP that's out right now for 200 wheelchair accessible units in Louisiana. We gave you a link to their program, which has their admin plan. So you can take a look at-- you know, if that's what you're thinking of, you can get some-- at the Louisiana, you can get an example of an owner solicitation. You can get a lot of stuff both from the HUD web page and these web pages, if this is something you're looking at. Next slide, please.

Switching gears, HUD has provided a bunch of waivers during this period of time to assist housing agencies to increase utilization, because they understand that, right now, it's challenging. So three of these are only for mainstream vouchers, and they're in the Notice 2020-22. You can have lease terms of less than one year regardless of prevailing market practices.

The second one's really important, because I know Liz said earlier that programs-that the mainstream voucher had to be-- screening processes were the same for all housing choice participants. But this waiver allows you to deal with this population differently, which may help you identify people, especially people who are really going to need the support of rental assistance in the community. So that's a really awesome waiver.

There's a waiver for those folks. They've seen a couple of people where you get your voucher before you're 22, but you haven't leased up by the time you're 62. There's a waiver for that. That could be potentially helpful, although we hope you won't cut it that close most of the time. And then all-- separately in a notice issued earlier that HUD put out to help people-- housing agencies for COVID, there's some waivers around how you give public notice when you open and close your waiting list. So take a look at that one, because that can also be very helpful.

So combining a whole bunch of these practices will help you, hopefully, around partnerships, maybe thinking about project basing, and using these waivers will help you increase your utilization and targeting the population that you want. There-- back one slide real quick. I think in the chat box, there's some stuff about this where you can go get information about this, get the recording for this webinar, the last webinar,

and sign up for the next webinar, which is December 14. And I'm going to turn it over to Ashley to hopefully answer a few more questions.

ASHLEY MATTHEWS: Yes, absolutely. Thank you for the presentation. That was really interesting. OK, so we have received-- I just want to acknowledge that I have received a few questions about project-based vouchers, and I am not an expert on project-basing vouchers. So what we can do is I think since there is a lot of interest in that, HUD can take those questions and create a separate FAQ on project-based vouchers, where I can get the experts in that area to weigh in. So I'm not going to answer any of the project-based voucher questions on this call, because I just am not sure.

We got a question. "Please confirm that all clients must be selected from the housing authority's waiting list, regardless if they're referred from partner agency, organization, or the CoC."

So yes, technically, all of your admissions are coming from the waiting list. If you are getting a referral from the coordinated entry system, and you have a preference specifically for the referral from the coordinated entry system, then they're going to obviously be going to the top. But it's an important distinction that they are technically getting added to the waiting list and coming off of the waiting list, even though they kind of have a ticket to the top. And with your partner agency referrals and people who are coming in that meet a certain preference, those folks are all getting technically added to your waiting list. Even though they may be coming in and going straight to the top of the waiting list, that's still, technically, pulling them from the waiting list.

And you know, as we've talked a little bit about, PHAs have other preferences, and you're kind of layering your preferences together. So let's say if you have a local residency preference, somebody that comes in with your mainstream NOFA preference that you established that doesn't have the residency preference might not get-- would be assisted after somebody who met that other residency preference. So it's just important to go through the actual motion of putting them on the waiting list and evaluating all of the preferences.

We also got a question about portability, and yes, any mainstream voucher holder can port, even if the PHA that they're trying to go to doesn't have a mainstream voucher. Then they could get-- if they wanted to absorb them, they could absorb them as a regular voucher. Mainstream voucher holders need to have the same rights as other participants in the program, even if their receiving PHA doesn't have mainstream. We've received several questions about separate waiting lists. I mean this is just sort of a theme that goes through separate waiting list. People have asked about having separate preferences for mainstream or the regular voucher program. Any area where folks want to apply a separate policy to mainstream, then the regular voucher program, our legal counsel has determined that HUD does not have that authority to do that. They've said that mainstream vouchers are to be treated, policy-wise, exactly like regular vouchers. And so I think that has caused some confusion and some frustration for a lot of people.

And we-- somebody asked, are we considering allowing separate waiting lists? It's certainly something that we've heard loud and clear from PHAs that that's something that they would like to do. I'm not sure if it's something that is realistically going to happen kind of before most of these vouchers get leased up. So it is probably better to just kind of work within that requirement of having one HCV waiting list. And yeah. So let me see if there's anything new that's come in.

Sorry. Let me just-- if we verify preference eligibility at the time of application, do we need to re-verify when the applicant comes up on the waiting list? I need to double check this, but I believe that we-- that it needs to be as of admission, that they need to meet the criteria when they're admitted. But I can double check that.

A few people have asked, what's the requirement for leasing up, like how fast you have to have the vouchers leased up that you – mainstream vouchers that you receive? So we're always judging by-- judging from the effective date of the vouchers. So the effective date-- typically, PHAs have a little bit of flexibility in choosing their effective date. So we're typically looking at 12 months from the effective date of the vouchers for 80% to be utilized.

For the fiscal year 2019 NOFA, we did provide an extension of six additional months. So if your vouchers were effective in July, 2020, then you wouldn't need to be meeting that 80% requirement until I think, if I'm doing my math right, January, 20-22, so you have a year and a half to utilize them.

If you're getting vouchers through this new opportunity through 2020-22, we've said 12 months. So whenever you make those vouchers effective, you would have 12 months from then to utilize 80% of that amount that you requested. OK, maybe we have time for one more question. We got a question about the coordinated entry system preference, what that would look like, and what documentation would certify that preference.

Lisa Sloane may be able to help a little bit more with this question, but I believe that--I believe the SNAPS office has actually been-- SNAPS office within HUD has done

some work on providing examples of grant entry system preferences. And I think that the verification of that preference is actually really easy, because you're working with the CoC, and they can provide verification. But I don't know if you have anything else to say about that, Lisa.

LISA SLOANE: No, I totally agree. It makes it really easy, and Caroline did have a couple of examples. I don't know if you want to use those in an FAQ or something at some other point in time, or we could provide them in the next webinar.

ASHLEY MATTHEWS: OK, we actually have one last question on CoC. Can you talk again about the referrals from the CoC? Do you wait until they make the application to pull them? And then do you pull all targeted preference, or do you just pull the CoC referrals?

So I'm kind of-- I would envision it more as you are-- as you have vouchers available, you're kind of connecting with the CoC to see if they have anybody to refer over. I know that work with the-- with CoCs can be kind of time sensitive. You know, you have people that need housing immediately, and they're kind of looking for whatever option works best for them at that time. So it's not something where you're probably going to be pulling them over and having them sit for a long time on the waiting list. That's sort of happening-- as you have the vouchers available, they're kind of referring people over.

I'm not sure if that's exactly answering your question. But again, I think we have some more information on CoCs that we can share with the group. All right, I think that that is all the time we have for questions. So thank you again for attending and for having me.