



Mainstream Voucher Basics

Facilitated by Technical Assistance Collaborative

October 15, 2020



Webinar Logistics

- All Lines Muted
- Submit Questions through the Q&A Box
- For technical issues- use the Chat Box
- This webinar is being recorded and will posted to the HUDEXchange

Agenda

- ➔ •Introductions/Welcome
- ➔ •Overview
- ➔ •Admission Preferences
- ➔ •Waiting List Management
- ➔ •Additional Policies
- ➔ •Reporting Requirements
- ➔ •Q&A

Introductions & Welcome

- Ryan Jones, Deputy Director, Housing Choice Voucher Management and Operations Division, HUD
- 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 first in a 3-part series:
 - ▶ Today's Webinar: *Mainstream Voucher Basics*
 - ▶ November 18th at 1pm: *Mainstream NOFA Preferences & Strategies to serve Target Populations*
 - ▶ December 14th at 1pm : *Leasing during COVID-19*
- 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
- If PHA staff, does your agency currently administer Mainstream vouchers?
 - ▶ Yes
 - ▶ No
 - ▶ I don't know

Overview

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.

Different Names for the Same Thing

- Mainstream Housing Opportunities for Persons with Disabilities (predecessor program)
- Mainstream 5 Year
- Mainstream 5
- MS5
- Section 811 Vouchers

Mainstream is NOT

- Non-Elderly Disabled (NED) Voucher Program
- Mainstream 1-Year (mostly rolled into NED program)
- NED Category 2/Nursing Home Transition
- Section 811 PRA
- Section 811 PRAC

Mainstream Vouchers vs. Non-Elderly Disabled (NED) Vouchers

■ Similarities

- ▶ Serve non-elderly persons with disabilities.
- ▶ Follow the program policies of the regular Housing Choice Voucher (HCV) program.

■ Differences

- ▶ Mainstream vouchers serve a broader group – eligible member does not need to be head of household.
- ▶ Separate financial reporting for Mainstream. NED reporting is combined with regular voucher program.
- ▶ Different program code for line 2n of the HUD-50058.

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](#)

Appropriations & NOFAs

- Congress appropriated funding for new Mainstream vouchers in 2017, 2018, and 2019.
- Since Sept 2018, HUD awarded:
 - ▶ 27,000 new vouchers
 - ▶ to 463 PHAs
 - ▶ Totaling **\$232.2** million through two NOFAs
- Prior to 2018, there were 14,800 Mainstream vouchers. The last award was made in 2005.

New Vouchers Authorized by CARES Act

- PIH Notice 2020-09- May 2020
 - ▶ Authorized 30% increase in Mainstream Voucher units and budget authority for those PHAs awarded in FY17 and FY19 NOFAs
- PIH Notice 2020-22- Sept 2020
 - ▶ Non-competitive opportunity of up to \$150,000,000 for new Mainstream vouchers
 - Any PHA administering HCVP eligible to apply
 - Rolling Application Process- Due no later than 12/31/2020



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.

Participant Eligibility

Participant Eligibility

- Vouchers must be used to assist non-elderly persons with disabilities and their families.
- Non-elderly person with disabilities must be at least 18 years of age and less than 62 years of age.
- The eligible household member DOES NOT need to be the head of household.
- Eligibility for the voucher is determined at the time of new admission, i.e. when the HAP Contract is signed.
- Non-elderly persons with disabilities who turn 62 after being admitted will not lose assistance.

Participant Eligibility

- *Non-elderly person with disabilities* (for purposes of determining eligibility):
A person 18 years of age or older and less than 62 years of age, and who:
 - (i) Has a disability, as defined in 42 U.S.C. 423;
 - (ii) Is determined, pursuant to HUD regulations, to have a physical, mental, or emotional impairment that:
 - (A) Is expected to be of long-continued and indefinite duration;
 - (B) Substantially impedes his or her ability to live independently, and
 - (C) Is of such a nature that the ability to live independently could be improved by more suitable housing conditions; or
 - (iii) Has a developmental disability as defined in 42 U.S.C. 6001.

Admission Preferences

Mainstream NOFA Admission Preferences

Target Population	FY17 Mainstream NOFA	FY19 Mainstream NOFA
Transitioning out of institutional/segregated settings	X	X
At serious risk of institutionalization,	X	X
Currently experiencing homelessness	X	X
At risk of experiencing homelessness	X	X
Previously experienced homelessness and currently a client in a PSH or RRH project		X

*PHAs were required to update administrative plans within one calendar year of award date for FY17 or within 6 months for FY19

Audience Poll

- 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)

Preferences

- Preferences affect the order in which families on the waiting list receive assistance.
- The preference cannot be applied only to Mainstream vouchers.
- Adopted preference should be incorporated into PHA's overall preferences and policy for applying preferences must be included in the PHA's administrative plan
- PHAs must ensure that their preferences do not exclude persons with certain disabilities from accessing assistance or violate other fair housing or civil rights laws. See regulations for waiting lists and preferences at 24 CFR 982.201-207

Preference Options

- The preference may be limited to a certain number of applicants.
 - e.g. up to 100 renewable vouchers, or 100 one-time vouchers
- 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.

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.

Waiting List Management

Waiting List Management

- At turnover, ALL Mainstream turnover vouchers must be reissued to the next Mainstream-eligible family on the PHA's waiting list.
- Awarded vouchers are for new admissions. Must lease awarded vouchers by pulling Mainstream-eligible applicants from the waiting list
 - PHAs may not reassign existing participants to the Mainstream program to “free up” regular housing choice vouchers
- PHAs must maintain one waiting list for all tenant-based assistance (24 CFR 982.204(f)), which includes Mainstream voucher assistance
- Option to open PHA waiting list for a limited preference
 - The PHA may adopt criteria defining which families may apply for assistance when opening its waiting list
- Must comply with the requirements for opening the waiting list under 24 CFR 982.206, including the requirement to provide public notice and to accept applications from families for whom the list is open

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

- 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

- 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

Additional Policies

Portability

- Mainstream participants are eligible for portability
 - ▶ If the receiving PHA has a Mainstream voucher available, the participant can remain a Mainstream participant.
 - ▶ If the receiving PHA does not have a Mainstream vouchers available, the participant can receive a regular voucher.

Portability

- Most PHAs require that applicants that did not live in their jurisdiction at the time of application lease up within the jurisdiction for at least one year before porting.
- PHA's policy must be the same for Mainstream as for regular vouchers.
- Reasonable accommodations are allowable if there is a nexus between the disability and the need to port out.

Payment Standards

- Cannot implement different payment standards for Mainstream.
- Reasonable accommodations are allowable if there is a nexus between the disability and the need for a higher payment standard.
- PHA may approve an exception payment standard as a reasonable accommodation up to 120% of FMR.
- If an exception payment standard higher than 120% is required as a reasonable accommodation, PHA may submit waiver request to field office for HUD HQ approval.

Project-based Vouchers

- Mainstream vouchers apply to the PHA's overall cap.
- Mainstream vouchers can be PBVed.
- Consider fair housing implications of PBVing vouchers specifically for persons with disabilities.

Reporting Requirements

HUD-50058 Reporting

- PHAs must submit a form HUD-50058 (or form HUD-50058 MTW) to IMS/PIC, including Voucher Issuance (action code 10), Voucher Expiration (action code 11), and End of Participation (action code 6).
- Line 2n. Special Program Type = MS5
- Line 4c. Homeless at admission? – please indicate if the family was homeless at admission

SEMAP

- Mainstream vouchers should be included in SEMAP.
- PIC excludes them from PIC-calculated indicators.
- FMC recalculates PHA's leasing rate to include Mainstream vouchers.
- FMC does not consider units during the initial increment.
- Detailed example in PIH Notice 2020-01.

Financial Reporting

- Funding and financial management is separate from the regular voucher program.
 - ▶ Voucher Management System (VMS)
 - ▶ FASS-PH
 - ▶ Cash management and shortfall

VMS Reporting

- Report HAP under Mainstream 5 year.
- Don't report Mainstream units or expenses elsewhere in VMS.
- No separate field for prorated HAP expenses, so report them with the Mainstream HAP for the month they were incurred.
 - ▶ For example, if the HAP Contract is effective of February 14, 2020, the HAP paid for Feb 14-29, 2020 would be reported under Feb 2020.
- Report units in the first full month of leasing.
 - ▶ For example, if the HAP Contract is effective on February 14, 2020, the unit would first be reported under Mainstream 5-year UMLs in March 2020.

FASS-PH

- Report in FASS-PH under different CFDA number 14.879.
- See accounting brief on Mainstream webpage for details on reporting.

Common Questions

Q&A: Participant Eligibility & Screening

PHA Question

- Can a PHA implement eligibility screening criteria for Mainstream vouchers that is different than the eligibility screening criteria for the regular HCV program? In other words, can a PHA maintain its current criminal history lookback periods for HCV, but use only the HUD-mandated exclusions (Lifetime registered sex offender and production of methamphetamine in federally assisted housing) in order to provide a program that more closely aligns with Housing First principles for people experiencing homelessness?

HUD Response

- No, there is no special authority to treat families that receive Mainstream families differently from other housing choice voucher program applicants and participants.

***Current Waiver: Notice PIH 2020-22 states 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).**

Q&A: Applying Age Limit Criteria

PHA Question

- Which is the correct application of the age 62 limit? Do I allow a lease-up as long as the voucher was issued before the applicant's 62nd birthday? Or must the HAP Contract effective date be before the 62nd birthday?

HUD Response

- At the time of admission, i.e. initial HAP Contract signing and the action type 1 HUD-50058, the household must include a non-elderly (at least 18 years of age and less than 62 years of age) person with disabilities. After this date, the eligible household member may turn 62 and retain the voucher.

***Current Waiver:** Notice PIH 2020-22 states that 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.

Q&A: Establishing Preference for CE Referrals

PHA Question

- Can a PHA use the CoC's Coordinated Entry system to identify and refer applicants for Mainstream vouchers, as long as it is in compliance with PIH Notice 2013-15? This notice allows PHAs to give a preference of referred clients (from Coordinated Entry) over clients who apply directly to the PHA.

HUD Response

- Admissions preference requirements for Mainstream vouchers are the same for regular tenant-based assistance. Mainstream vouchers exclusively serve non-elderly persons with disabilities, so PHAs must take particular care to ensure that their preferences do not violate fair housing laws. Providing a preference for individuals referred from a specific organization that serves persons with certain types of disabilities is not allowed. Assuming the Continuum of Care's Coordinated Entry system is not disability based, it is acceptable for families referred by the CoC to receive a preference. 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: Opening/Closing the Waitlist

PHA Question

- Do we have to open our waiting list to be in compliance with the NOFA or if we currently have enough families/individuals on our existing waiting list who meet the NOFA criteria and who have applied directly to us, can we use our existing waiting list until we need to open the waiting list?

HUD Response

- There is no requirement to open the waiting list. Waiting list administration is up to the PHA. If the PHA claims points for implementing a preference, HUD expects that the PHA will either confirm there are eligible families on the waiting list or open the waiting list to receive applications for those that meet the preference category claimed.

Q+A: Waiting List Management once Mainstream fully leased

PHA Question

- We just leased up our last Mainstream Voucher in our portfolio and are ready to begin issuing regular vouchers to those next on our waiting list. Two of the households at the top of our list are Mainstream eligible families. Can we skip over these households on the list since we are 100% leased on Mainstream vouchers?

HUD Response

- No, a PHA cannot skip over a Mainstream eligible family because it is currently serving the required number of Mainstream families. For example, if the PHA has leased 100 percent of its Mainstream vouchers, but is ready to issue five regular vouchers, and the next five families on the PHAs waiting list all include a non-elderly person with disabilities, the regular vouchers would be issued to the next five families on the waiting list, which in this case would be five families that include a non-elderly person with disabilities.

Questions?

