

# **Mainstream Voucher Basics Webinar 10-15-2020**

LIZ STEWART: Hi, everyone. Welcome to the Mainstream Basics webinar. My name is Liz Stewart. I'm with the Technical Assistance Collaborative.

Before we dive right into our material, I want to cover some webinar logistics. Today we have a really large audience, which is great, but for that reason all lines are going to be muted. You are able to submit questions through the Q&A box. And in addition, if you're having technical issues, please use the chat box to identify those. And we will try to take care of that.

This webinar is being recorded. And the slides, as well as the recording, will be posted to the HUDExchange. Today's webinar is, again, going to be covering some key basics of the Mainstream Voucher Program.

We'll be doing an overview. We'll be discussing some details on admission preferences, waiting lists management, additional policies to be mindful of, and then outlining specific reporting requirements. As I said before, we are going to have time for the Q&A. So throughout these different sections of the presentation, feel free to go ahead and put your questions in the question box. I'd like to hand it over to Ryan Jones at HUD to start us off with some introductions.

RYAN JONES: Thanks, Liz. Hello, and thank you for joining today's webinar. I'm Ryan Jones, deputy director for the Housing Voucher Management and Operations Division within HUD'S Office of Public and Indian Housing. Our office is responsible for developing national policies, procedures, standards, methods, and administrative requirements for the Housing Choice Voucher Program.

It is my pleasure to welcome you to today's webinar on Mainstream Voucher Basics. We are excited to be partnering with the Technical Assistance Collaborative to provide a three-part series of webinars, in addition to communities of practice, technical assistance to help PHAs administer mainstream vouchers. In addition to today's webinar on Mainstream Voucher Basics, the next in the three-part webinar series will take place in November. That webinar will focus on the mainstream Notice of Funding Availability for "Preferences and Strategies to Serve Target Populations."

The final webinar in the series will take place in November [Editor's note: should say "December"], focusing on "Leasing during the COVID-19 Pandemic." As I've previously alluded to, the Technical Assistance Collaborative will also offer technical assistance using a communities of practice model to help PHAs work through some of

the challenges they may face in administering mainstream vouchers. Please stay tuned for more information about that technical assistance opportunity.

Thanks again for participating in today's webinar and for all that you do to make the Mainstream Voucher Program a success, I will now turn it over to Ashley Matthews. She is a senior housing program specialist in the Housing Voucher and Management and Operations Division and the lead for the Mainstream Voucher Program. Thank you, and be safe.

ASHLEY MATTHEWS: Hello, everyone. As Ryan said, I'm Ashley Matthews. I'm the primary point of contact for mainstream vouchers at HUD headquarters. Over the past few years, we've had a huge increase in funding for mainstream vouchers. And you, at public housing authorities across the country, have turned that into meaningful housing assistance to at least 14,000 additional families already. And we have more being served every day.

Whether you've been administering mainstream for decades or you're just submitting a new application for mainstream vouchers now, this training will provide valuable information to you. So I'm thrilled to have TAC providing this webinar today. And I'll be sticking around for the questions and answers period to try to field your questions as best I can. So I'll turn it back over to Liz.

LIZ STEWART: Great. Thanks, Ashley. As I said before, my name is Liz Stewart. I'm with the Technical Assistance Collaborative. We are a nonprofit consulting firm in Boston. And we are also a national TA provider.

And we are going to be assisting HUD with this webinar series, as well as the community of practice that's going to be coming about in the late winter/spring. And so I'm really looking forward to getting to know this group of PHAs and staff better as we kind of move along with the series and the community practice. Before we get started, I also want to allow Lisa Sloane an opportunity to introduce herself.

LISA SLOANE: Hi, Lisa Sloane, I work with Liz at TAC. And I'm, ditto, what Liz has said, excited to be working with you all. This is a great opportunity for you to be providing this assistance to people with disabilities in your communities. And we hope that we can help you do that effectively and efficiently.

LIZ STEWART: Great. Thanks, Lisa. OK, well, now that you've heard kind of who we are, we want to get an idea of who is in the audience today. So, Laura, I'm going to go ahead and have you initiate an audience poll. So we'd like to know what your role is in your agency.

So answer that first question. If you are not one of the answers that are outlined there, you have a different role, it would be great if you outline who you are in the chat. Let us know who you are. And if you are a staff of PHA, please let us know if your PHA currently administers any mainstream vouchers.

So we're going to get collecting that information. And, Laura, when you think that there's a good amount of folks that have answered, we'll go ahead and share that poll.

LAURA HARRIS: OK. I just shared the results so you should be seeing them on your screen.

LIZ STEWART: I do, great. Yeah, so it looks like the majority of folks that are on today's webinar are with a PHA staff, which is great, either in a management role. Management role is 53%, other PHA staff 28%, executive director 14%. And we also have a small amount of service providers here, which is great, and some folks that are in another role.

We also have a really good mix of PHAs that are currently administering. Majority of you already are administering mainstream vouchers, 68%, but there's 29% of you, 91 on the call, that are not. So hopefully, you'll get a lot of good information today on this webinar.

Now we're going to go ahead and move into an overview of mainstream vouchers. So Mainstream vouchers must assist non-elderly persons with disabilities. And non-elderly is defined as those persons that are at least 18, but not yet 63 [Editor's note: The correct upper age limit is "not yet 62"] at the time of admission.

Mainstream vouchers can be either tenant-based or project-based rental assistance. And one key thing that is really important to highlight that you're going to hear over and over again today is that outside of assisting a special population, Mainstream vouchers follow the same policies as the tenant-based voucher program. And while the same policies apply to Mainstream vouchers, the funding and the financial report are separate. And we'll be discussing those a bit later in the presentation.

There are a few different names that have been used over the years to apply to Mainstream vouchers. So we want to be clear that all the names that you see on this slide, all the terms or names that are on this slide, are considered Mainstream vouchers. And the requirements that we'll discuss today apply to these vouchers.

So if you're a PHA that operates Mainstream 5-Year, Mainstream 5, or you hear MS5 or Section 811 vouchers, those are all considered Mainstream vouchers. And again, the information that we discuss today is going to apply to all of these different names

for basically the same thing. We also want to outline what Mainstream is *not*, to ensure that we're clear and not have any confusion.

So Mainstream is not NED Voucher Program, which is the Non-Elderly Disabled Voucher Program. It is not Mainstream 1-Year. Those vouchers have actually mostly rolled into the NED program.

It is not NED category 2 Nursing Home Transition Vouchers. It is not Section 811 PRA. And it is not Section 811 PRAC.

And we want to highlight what some of the key similarities are and differences between NED vouchers, because they look very similar from the outset. And there's only a few items that are really distinct differences. So we just want to show here that the similarities are that both Mainstream vouchers and NED vouchers serve non-elderly persons with disabilities. And they both follow the program policies of the regular Housing Choice Voucher Program.

Where they differ is that the Mainstream vouchers serve a broader group. The eligible member does not need to be that head of household, or co-head, or spouse. They could be any member of the household, whereas with the NED PRAC program, the households served, the person with a disability has to be the head, co-head, or spouse.

In addition, the separate financial reporting, there's the separate financial reporting from Mainstream. And NED reporting is combined with the regular voucher program. And there's a different program code for Mainstream vouchers, which is 2N of the HUD-50058.

The slide you see here has all of the applicable guidance that you would use for the Mainstream vouchers. The 24 CFR part 982 and 983 that apply to the Housing Choice Voucher Program apply to the Mainstream vouchers. Because again, they, the policies there apply to Mainstream vouchers.

There are also some specific HUD notices that apply to mainstream vouchers. PIH notice 2020-01 has revised policies and procedures for the Mainstream Voucher Program. There's also PIH notice 2020-09. PIH notice 2020-22.

In addition, there is chock-full of information in the FY17 NOFA FAQs and the FY19 NOFA Q&As. Those are all posted online. And there are links in the slides, which again will be posted later. And then there is the PHA Mainstream Voucher Page, which also has additional resources on it. So encourage everyone to check out those resources for additional information.

Now we're going to cover the appropriations and NOFAs that have recently come out for Mainstream vouchers. So Congress appropriated funding for new Mainstream vouchers in 2017, 2018, and 2019. So for a lot of you that have received a recent award, the appropriations for the funding would have come over under one of those allocations.

Since September 2018, HUD has awarded 20,000 new vouchers to 463 PHAs, totaling \$232 million through two NOFAs, one in 2017 and one in 2019. Prior to 2018, there were 14,800 Mainstream vouchers. And the last award was made in 2005. So of recent, there are a lot of new vouchers that have put out on the grounds.

I also want to talk about some of the new vouchers that have recently been authorized by the CARES Act. So PIH, Notice 2020-09, that was published in May of 2020. That authorized a 30% increase in Mainstream voucher units and budget authority for those PHAs that were already awarded in the FY17 and FY19 NOFAs. And those PHAs would have already gotten an award letter from HUD outlining that increase.

In addition, there is a more recent notice that went out in September of 2020 that outlines a non-competitive opportunity of up to \$150 million for new Mainstream vouchers. Any PHA administering Housing Choice Voucher Program is eligible to apply. So for the 40 or so of you that had highlighted that you were not currently administering Mainstream vouchers, this opportunity is open to you, as well as to PHAs that already are administering Mainstream vouchers either through one of the awards in FY17 or FY19 or previously.

Now this process is a rolling application process. And the applications are due no later than December 31, 2020. And just want to make a note there that there is additional information outlined in the PHA notice 2020-22. So please review that notice before you submit, but that the deadline is 12/31/2020.

This next slide outlines some of the COVID-19 specific waivers that HUD has recently issued. So some of these waivers are only specific to Mainstream. And another one is specific to the Housing Choice Voucher Program overall. So the Mainstream only are outlined in PIH 2020-22. And then the one listed here for the waiting list is in notice PIH 2020-13.

Now there are multiple waivers that are outlined in that notice that apply to the Housing Choice Voucher Program. And, again, because the same policies apply to Mainstream, Mainstream vouchers would be able to apply for those waivers as well. But we just wanted to highlight the Mainstream-only waivers that are outlined in PIH notice 2020-22, as well as the waiting lists waiver, because we're going to be talking about waiting lists today.

So just please make note that these are current waivers that PHAs can apply for, but they do not apply to the regulations of the program. They are waivers to those regulations. So we can use this chart as a reference point to go back to what is a requirement and what current waivers exist now.

We're going to move on to covering participant eligibility of Mainstream vouchers. So as I stated before, Mainstream vouchers must be used to assist non-elderly persons with disabilities and their families. A key distinction with Mainstream vouchers is that the non-elderly person with disabilities must be at least 18 years of age and less than 62 years of age, but 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 their assistance. So once households are admitted into the program and the eligible member was less than 62 at the time of entry into the program, if they turn 62 after that, they still maintain their assistance.

And this slide outlines the definition of non-elderly person with disabilities. I'm not going to read through it, because I think everyone can read it. But it's a good reference point of what a non-elderly person with disabilities is considered. And now we're going to move on to admission preferences. Lisa, I'm going to hand it over to you.

LISA SLOANE: Thanks, Liz. Good afternoon, everybody. Thanks for joining us. Before I start talking about the Mainstream voucher preferences, I wanted to briefly provide some context for the FY17 and FY19 NOFAs that relate to-- next slide, please, Laura or Liz, sorry. Thanks.

Yep. So some context for this slide specifically. For those of you who were awarded FY17 Mainstream vouchers, you might recall that in the NOFA, HUD indicated that it had worked with the federal Department of Health and Human Services to develop the NOFA, and that, as a result, the NOFA incentivizes four preferences that help in order to further the goals of the Americans with Disabilities Act, or the ADA, and to help people with disabilities live in the most integrated setting. And you can see those four preferences in the second column.

They're transitioning out of institutional segregated settings (for people with disabilities); at serious risk of institutionalization (for people with disabilities); currently experiencing homelessness; people at risk of homelessness, those four. For the FY19 NOFA, in addition to furthering the goals of the ADA, HUD wanted to support the goals of the Home Together, of the report Home Together, which is the federal strategic plan to prevent and end homelessness. So in the FY19 NOFA, an

incentive for a fifth preference was added. And you can see that one there. And that one is for people with disabilities who previously experienced homelessness and are currently a client in a permanent supportive housing or rapid rehousing project.

So I want to also point out that the FY20 notice does not specifically incentivize preferences, but that if you read the notice carefully, HUD is encouraging you to work with your local partners to use vouchers to address an overall community housing plan. The notice points out that many localities are working urgently to address the impact of COVID on people with disabilities. And that would include people with disabilities, or homeless, or at nursing facilities. And certainly, Mainstream vouchers would be helpful in either of those regards. Next slide, please.

So we are going to-- we just talked about five preferences. And we'd like to do a quick poll for those of you. And we realize the previous poll indicated some of you have not yet had awards.

But for those with who have recent awards of Mainstream vouchers which preferences, if any, did you establish? And this is a multiple choice question. You can pick as many as you have established. How does it look, Laura?

LAURA HARRIS: Just give folks another couple seconds here.

LISA SLOANE: OK. Wow. Well, it looks like 80% of you-- 80% of those awarded recent vouchers have established a preference for those who people with disabilities who are currently experiencing homelessness, and then close at your heel, 67% of you at risk of homelessness. 58% of you have created and established a preference around transitioning out of institutions or other segregated settings.

Fewer of you did at risk of institutionalization. And 38% of you have targeted those who are formerly homeless and currently in permanent supportive housing or rapid rehousing, what people think of as a move-on preference. Great. OK, Thanks very much.

So let's start with some general discussion or general information about preferences, a little bit of level-setting. Preferences affect the order in which families on the waiting list receive assistance. Preferences that the PHA select, that you select, cannot be applied only to Mainstream vouchers. We'll talk a little bit more about that in a second.

Any preferences you adopt have to be included in your admin plan. You have to into your overall preferences and policy and how you apply those preferences. And in selecting and drafting specific language for preferences, you really must ensure that

the preferences don't exclude people with certain disabilities from accessing assistance or violate other fair housing laws or civil rights laws. And you can see the citation for the reference in the CFR right there.

Next slide, please. So in addition to these general preference requirements, you have a number of options related to preference. So for example, preference may be limited to 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 have 100-- we will have provide a preference for up to 100 people who are experiencing homelessness.

So you can have a limitation, a cap or a limitation like that. Housing authorities that wish to target your assistance to one of the NOFA targeted groups, you could adopt a preference for just that group. For example, you can adopt a preference only for those transitioning out of institutional other segregated settings. But it's really important to note that if you received an award in FY17 or '19 or from a NOFA in which you claimed points for a preference, you must adopt that preference for at least one of the targeted groups in the NOFA.

So it's a may for housing authorities that want to do this, but it's a must for housing authorities that received funding through the NOFA and claim preference points. Housing authorities, you can wait and layer your preferences 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 scheme. And now you're adding a preference for people who are homeless, and you're going to have 10 points for that preference.

So someone in that case, someone who lives or works in your community, will get two points. Someone who is homeless on your waiting list would get 10 points. And someone who is homeless and lives or works in the community covered by your geography would get 12 points. So you can wait and layer, depending on whatever your preference scheme is. Next slide, please.

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 that you can adopt a preference specifically for your Continuum Of Cares, or CoCs coordinated entry



system, because that system is not disability specific. Again, this preference, as we've said before, can be layered on other preferences as well. Why don't we talk for a few minutes about waiting lists management more generally and how it relates to Mainstream vouchers?

So first some general points, at turnover, all, and you can see that's capitalized and underlined, Mainstream turnover vouchers must be reissued to the next mainstream eligible family on the PHA's waiting list. Your new Mainstream vouchers are for new admissions. You have to lease the awarded vouchers by taking people who are Mainstream eligible applicants from your waiting list.

HUD has indicated you can not reassign existing participants-- or participants who have one of your vouchers-- to the Mainstream program in order to free up those vouchers for other households. Housing authorities have to maintain one waiting list for all tenant-based assistance, which includes Mainstream voucher assistance and other tenant-based assistance that you have through the Housing Choice Voucher program.

You have the option to open the waiting list for a limited preference if you adopt and you can adopt criteria defining which families can apply for assistance when you open your waiting list. When you do this, when you open your waiting list, you have to be careful to comply with the regulations with the CFR, including the requirement to provide public notice and to accept applications from families for whom the list is open. As Liz indicated a few minutes ago, some of you may be taking advantage of current waivers, but that is a waiver to the regulation. But most of the time the regulation is in place, you want to be really that carefully. Next slide.

This slide summarizes-- oops, oops, back. This slide here summarizes the points made on the previous slide and shows you exactly where you can find the reference in the regulations in the CFR. So specifically, covered by the regulations are that the housing authority has to maintain one waiting list for all your tenant-based assistance, two that you may limit the number of people who will qualify for preference as we discussed, that you may adopt criteria defining which families may apply for assistance when you open your waiting list. You can say only people who are homeless, only people coming from coordinated entry, other preferences that are non-discriminatory and consistent with the regulations.

You must have written policies in your admin plan for how preferences will be applied. And in the last example here is not from the CFR, but it's from the NOFA through which you will received an award. And again, in that NOFA, because you received points or past a threshold requirement, indicating you would serve one of

these populations, you must adopt a preference for one or more of the targeted groups listed in the NOFA. Next slide.

So updating your waiting list, I know this has been an issue for many folks. So it's important to understand HUD requirements. If there is a change in an eligible population, the housing authority has to think about whether you'll do a full waiting list update or a limited update. HUD'S been clear that a full or limited update may be done regardless of whether you're going to be opening your waiting lists or not.

So the example I've been thinking about is you may have a very robust waiting list, a long waiting list, and you know that there are people who are going to be eligible on your waiting list, but maybe your initial application form did not have a way for someone to indicate if they had a disability or not. So you have a robust waiting list. So you know there are folks there who are eligible. You don't want to open your waiting list, but you can't find who's eligible, because that wasn't information you requested in your initial application. So you may need to do an update without opening your waiting list to identify who is going to meet your criteria.

So there are two as the slide indicates. There are two options, a full waiting list update or the limited waiting list update. So the full waiting list update is required if you're establishing a new preference. So if you are planning to serve people coming from institution-- people with disabilities who are non-elders, who are households who have a non-elder member, who has a disability coming from an institution, and that's not a preference you've ever had, you're going to have to do a full waiting list update. Because you don't know if anybody on the list meets those criteria.

So as this slide indicates, you would send out a letter to all the applicants. You would update the list based on the preference. And then you would pull from that waiting list the first person who meets whatever criteria, whatever preference you have established for that household. Next slide, please.

You can also choose to do a limited waiting list update, but only if you're not adopting a new preference. So for example, how does that work? You can determine the eligibility of existing families on your waiting list in smaller batches.

So this might work if you have a homeless preference already, but you need to do an update to identify people who are still homeless or to make sure that people are still looking for housing, those households who are eligible for Mainstream vouchers. So you would, for example, contact the top 30 families on the waiting list to see if any of them qualify for a Mainstream voucher and then offer the Mainstream voucher to the first family that includes a non-elderly person with a disability in the order in which they appear on your waiting list, which, of course, has been ordered by the

preferences that you have adopted as a housing authority in your admin plan. If you don't use all of your vouchers, the first 30, then you may the contact the next 30 until you have offered-- you've identified household and offered them eligible households and offered the voucher to them. So on that note, I'm going to pass it back to Liz.

LIZ STEWART: Sorry. So now we're going to move on to talking about additional policies that apply to the Mainstream vouchers. And again, I want to highlight that the policy is that you are implementing for your regular Housing Choice Voucher Program are also going to apply to the Mainstream vouchers. So the first one we want to talk about is any portability policies.

So for Mainstream vouchers, Mainstream participants are eligible for portability. If the receiving PHA that is being ported out to has a Mainstream voucher available, that participant can remain a Mainstream participant. If the receiving PHA does not have a Mainstream voucher available, the participant can receive a regular voucher. And again, as we said throughout this presentation, outside of serving a special population, the Mainstream vouchers will follow the same policies as regular Housing Choice vouchers.

So whatever the requirements the PHA has around portability for the regular Housing Choice Voucher Program must apply to the Mainstream voucher households as well. For example, 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 reporting out. But if the applicant requires a reasonable accommodation to port out before a year, that is allowable where there is a nexus between the disability and the need to port out. So for example, if the applicant the Mainstream applicant is disabled, which they are required to be under the participant eligibility, and due to their disability, they require an accessible unit, but there are none that are vacant in the PHA's geographic area and they locate one outside, that may be a reason to port out.

For payment standards, PHAs cannot implement a different payment standard for Mainstream. However, given the population being served, a participant could need a reasonable accommodation to allow a higher payment standard. And in those situations, PHAs may approve exception payment standards as a reasonable accommodation up to 120% of the FMR.

If the higher payment standard then that is needed, that is over 120% of FMR, then the chain must submit a waiver to the field office, which would be approved at the HUD headquarters level. As we noted earlier, Mainstream vouchers can be project-based and would be subject to the PHAs overall cap. Given the population served by Mainstream vouchers, PHAs need to be particular mindful of the fair housing requirements in place.

The owner and the PHA are responsible for ensuring that, in addition to complying with project-based voucher program requirements, the project complies with all applicable federal non-discrimination and civil rights statutes and requirements. And now we're going to discuss some of the specific reporting requirements for Mainstream vouchers. So for reporting on the HUD-50058, the PHAs must submit a form HUD-50058 or form HUD-50058 MTW for moving to work PHAs, to IMS/PIC, including various action codes, the Voucher Issuance-- that's action code 10-- the Voucher Expiration-- action code 11-- and the End of Participation-- action code 6.

For Mainstream vouchers, you're going to report line 2N the special program type for Mainstream vouchers is MS5. You also would want to report on line 4C whether or not the household was homeless at admission. Mainstream vouchers should be included on SEMAP. And the PIC excludes them from the PIC calculated indicators.

FMC recalculates PHAs leasing rate to include Mainstream voucher. FMC does not consider units during the initial increment. And a detailed example of this is in the PIH notice 2020-01, which we highlighted at the beginning of the slide. So please take a look at that if you have questions.

And again, while the policies are the same for the Housing Choice Voucher program, the funding and financial management are separate for the Mainstream vouchers. This includes reporting into VMS, the Voucher Management System, and FASS-PH. For VMS reporting, you want to report the HAP under the Mainstream 5-Year. Do not report Mainstream units or expenses anywhere else in VMS.

There's no separate field for pro-rated HAP expenses. So you'd 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 February 14 through the 29, 2020 would be reported on your February 2020. And you want to 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.

For FASS-PH, you report in FASS-PH under a different CFDA number. It is CFDA number 14.879. And there is an accounting brief that offers additional information on the Mainstream web page for details on reporting. And, again, the Mainstream web page was a resource that was outlined earlier in the slides.

And before we open it up to some of the questions that have been coming through, through the Q&A, I wanted to highlight some of the common questions that HUD has already provided some specific guidance on. So this first question is on participant eligibility and screening. And the question from the PHA is whether or not a PHA can implement eligibility screen screening criteria for Mainstream vouchers that is

different than the eligible screening criteria for the regular Housing Choice Voucher Program.

In this case, the PHA was interested in maintaining its current criminal history lookback periods for their regular Housing Choice Voucher Program, but use only the HUD mandated exclusions for their Mainstream voucher program-- Mainstream vouchers in order to provide a program that more closely aligns with Housing First principles for people experiencing homelessness. So HUD'S response to this, as we've noted throughout, is that there is no special authority to treat families that receive Mainstream families with Mainstream vouchers differently from other Housing Choice Voucher Program applicants and participants. So generally speaking, the requirement of the Mainstream vouchers are that you follow the same policies in place as the regular Housing Choice Voucher Program policies that you have in place.

I do want to highlight that this is a topic area where one of the current waivers applies, this outlined in the notice PIH 2020-22. So if the PHA chooses to utilize the waiver that's in place, the language states that PHAs may establish screen requirements for applicants for Mainstream vouchers, which are distinct from those in place from that Housing Choice Voucher Program, in general, but must still comply with the statutory requirements, for example, the lifetime sex offender requirement. So that language in the bottom of the slide that's red, that's just in place for the current waiver when that waiver expires.

The requirements of Mainstream voucher, the general requirements would apply. And those ones state that you can not treat families-- cannot have different screening criteria as for Mainstream voucher families then for other families assisted under the regular Housing Choice Voucher program. The next question is related to applying the age limit criteria.

What is the correct application of the 62 limit? Do I allow a lease up as long as the voucher was issued before the applicant 62nd birthday, or must the HAP contract effective date be before the 62nd birthday? HUD's response for Mainstream vouchers with their requirements that are in place, generally, is at the time of the admission, i.e. initial HAP contract signing, the household must include a non-elderly person, which means at least 18 years of age and less than 62 years of age and who is a person with disabilities.

After this date, the eligible household member may turn 62 and retain the voucher. And I just want to highlight here I misspoke earlier in the presentation, and I think I said 63. I just want to clarify for everyone that at admission the household must include a non-elderly person with disabilities. And non-elderly means at least 18 years

of age and less than 62 years of age. But in this situation, there is a current waiver in place.

So if you utilize that waiver, the 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. Another common question that we see is about establishing a preference for coordinated entry referrals. That 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 PHA is to give a preference for referred clients according to entry over clients who apply directly to the PHA. HUD's response is that admission 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 CoC's coordinated entry system is not disability-based, it is acceptable for families referred by the CoC to receive a preference. And you want to keep in mind that PHA still must follow the regulations on waiting lists administration and program admissions, including the requirement to use the waiting list for admissions.

Our next question our next common question is on opening and closing the waitlist. The PHA asks, do we have to open our waiting list to be in compliance with the NOFA, or if we currently have enough families, individuals on existing waiting lists to meet the NOFA criteria and who have applied directly to us, can we use our existing waiting lists until we need to open the waiting lists? HUD's response is, there is no requirement to open the waiting list. Waiting lists 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 claims. And the next question on waiting lists management, once the Mainstream vouchers are fully leased, the PHA asks, we just please leased up our last Mainstream voucher in our portfolio and are ready to begin issuing regular vouchers to those next on our waiting lists. Two of the households at the top of our list are Mainstream eligible families. Can we skip over those households on the list, since we are 100% leased on the Mainstream vouchers?

HUD'S response is that, 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 least 100% of its Mainstream vouchers, but is ready to issue 5 regular vouchers, and the next 5 families on the PHAs waiting lists all include a non-elderly person with disabilities, the regular vouchers would be issued to the next 5 families on the waiting list, which in this case would be 5 families that include a non-elderly person with disabilities. Now we're going to move on to the Q&A portion of the webinar. And, Ashley, I know you've been getting a ton of questions coming in. So I'm going to go ahead and hand it over to you to start going through some of these.

ASHLEY MATTHEWS: OK. So I started by answering some of them-- are you all getting an echo from me? OK.

LIZ STEWART: I think it sounds OK.

ASHLEY MATTHEWS: OK. Cool. So I've started answering some of the questions in writing, because I think we'll be able to get to all of your questions in this portion. So definitely check out in the Q&A where I provided written answers to some of the questions there.

So let me see what questions we have. So someone asked, we need to add a preference, And we have 3,000 people on our waiting list. Instead of sending each person a letter for the full waiting list, can we do a public notice posting for families to contact us if they're eligible?

So in our Q&A's on our website for the 2019 NOFA, we answered this question. And we said that the PHA, whenever you're adding a new preference, that policy for how you do that should be in your administrative plan. One side note is that notice 2020-13 allows you to make updates to your administrative plan a lot more easily right now as a waiver or an alternative requirement.

But anyway, so that policy should be in your administrative plan, how you're going to do that. You could have a policy where you do provide public notice, but what we would say is that you need to make sure that you don't-- if somebody comes forward to you, sort of after the deadline of when you asked for them to come forward, that you would not deny them the preference. You would still have to provide them the preference if they had not come forward in the timeframe allotted.

So let's see, another question we got is, I assume this person already has Mainstream vouchers from before, the 2018 and 2019 NOFAs. And they're asking, are these also for non-elderly, disabled? So, yes, the PIH notice 2020-01 discussed the fact that all Mainstream vouchers, even those awarded before 2018, now upon turn over-- so we're

not we're not kicking anyone off the program-- but once the voucher turns over, they need to serve any family that includes a non-elderly disabled person.

So that is a change for those PHAs that have been administrative Mainstream for decades and maybe haven't gotten a new award. Another question we got is, just to clarify, a family that includes a non-elderly person or non-elderly person with disabilities, that's under age 18, would that family qualify? And the answer is, no, the statute is very clear that the person needs to be at least age 18 or up to age-- right now we've kind of expanded that definition to be up to 63-- less than 63 instead of less than 62, which we provided that clarification in the Q&A written part.

But basically, the definition normally is at least 18 less than 62. Right now we're saying as long as they are issued the voucher when they're 61 or for less than 62, they can have their HAP contract signed when they're 62-- so less than 63 years of age. Let's see, what other questions?

Someone asked about reassigning existing HCV to free up Mainstream. We really want to stay away from any kind of reassignment. Any Mainstream vouchers should be served by new admissions.

So you're working through your waiting list and pulling folks from your waiting list in order to issue these vouchers. It shouldn't be taking existing voucher participants in recoding them as Mainstream. So I just want to make that clear-- that it should be people coming from the waiting list that you're serving when you have new Mainstream vouchers or turnover Mainstream vouchers.

Someone asked, do we have to have a waiting list? We have three referral agencies that will give us referrals for our 15 vouchers. So you do have to have a waiting list. And it's, as we've talked about in the presentation, you have one waiting list for regular vouchers and for Mainstream vouchers.

So your referral agencies would be providing you with eligible applicants that you would then be adding to your waiting list if you had a preference in place that they qualified for. They would then go to the top of the waiting list, depending on the other preferences that you have in place and how you're layering your preferences. But you do have to have a waiting list. You can't get direct referrals from agencies that are serving people only with certain disabilities. And just as a general rule, in the voucher program, all admissions are waiting list admissions, except for the special category of special admissions, but that's not what we're talking about here.

So you always have to be going through your waiting lists for your admissions. Let me see. A few people have asked about portability. And so, as I had just said, all



families that you're assisting with Mainstream vouchers are being pulled from your waiting list.

So a couple scenarios have come up. One question was, we had somebody come in as a port. And that person was new admission boarding. And they had a regular voucher they're porting to our housing authority. And we have Mainstream vouchers available.

Can we make them a Mainstream voucher? No. They can only become a Mainstream voucher as a new admission port in if they already had received a Mainstream voucher from the initial PHA.

OK, looks like we're getting a lot more questions. So let me have a minute to look at these.

Someone said so what happens after five years? We do have this name mainstream five year. That is just a carryover from another time.

Honestly, one of the only reasons that it's fixed is that we have such a hard time updating our-- you know, our PIC and VMS systems. It's really costly and hard for us to make updates. So in VMS they're called mainstream five year. And in PIC we use the code and MS5.

The five year doesn't have any meaning anymore. And it doesn't mean that your vouchers are going to expire. We've had a few people ask, do I need to reapply for the vouchers I already have? No. So your unit months authorized, your UMAs-- when you apply for a new award, you are getting new mainstream UMAs.

That number of UMAs that you have, once awarded, is not going to change. So you don't have to then reapply for those UMAs. So if you're applying for a new mainstream award, that is for to-- because you want to increase the number of your emails you have, you want to increase the number of families that you can serve at one time with your program. OK.

So someone asked what if the qualifying member is later removed from the household? So generally, our response is that eligibility for the program is determined at admission. And you don't need to continue to ensure that there's an eligible member. So if that person leaves for whatever reason-- if they pass away, you can continue to assist the family with mainstream voucher.

And we don't want to see families having their assistance terminated because the eligible member had to leave for whatever reason. And in this program, that very well may mean that they are possibly leaving because they have to be in a nursing home or

for whatever reason, we don't want families to lose our assistance. So eligibility is determined at that time of admission. OK.

A few people have asked if the new vouchers that are available through 2020-2022, if those are only available for people who are at risk of homelessness. That is not the case. What we've asked for-- and please read 2020-2022-- if you're thinking about applying-- but what we've asked is for PHAs to provide us with the reason why they need these vouchers due to COVID-19. Some of that could be that people are losing their jobs, they're facing eviction. We have all kinds of economic issues going on. It could be that they're specifically trying to provide sort of carry-on to an emergency shelter grant that their community has gotten where they want to provide more permanent housing as part of a longer term plan. So we're really open ended with that.

I think the most important thing-- because the CARES Act did authorize us to make this, that there be some connection with coronavirus. But aside from that, we're really leaving this up to the PHAs. And in terms of adopting a preference, you know, that again, is going to be up to the PHA. I don't want people to be-- or I don't PHAs to be scared of preferences. And we're going to the next webinar get more in detail with preferences.

And so I think they're a great thing that you can have in place to make sure when you have people in these very high need vulnerable categories that apply for assistance, that they can get assistance quickly. But just because you have a preference in place, doesn't mean you can't also be assisting other people on your waiting list. So the preference is control the order that applications appear. It's a great thing to have in place.

I've seen some people are saying we're getting rid of our preference because we weren't getting a lot of people referred. Well, you don't-- you know, you can get rid of your preference if you've already leased all the vouchers that you were awarded for the NOFAs. But you could also leave it in place if you get people that are qualifying for that preference, you can-- they'll go to the top of the waiting list, however your preferences are structured. And then if you don't have people that qualify, then you can go on down your list and serve those people on your waiting list.

So you know, one of the reasons that we didn't make it a requirement is that we want to leave it open to PHAs for maybe they have a different preference that works better for their community. And so I don't want people to shy away from preferences during this time, especially if you think it can help serve those who are most in need in your community. So again, next webinar in November is going to do a deep dive into preferences we have a lot of questions about preferences let me see.

Someone asked if we need to apply-- if we need to establish one of the five references, and can we just use age and disability? So again, this depends on did you get funding through one of the FY 17 or FY 19 NOFAs? Did your application say you were going to adopt the preference? If yes to those questions, then yes, you need to adopt one of the five references.

And-- but the only eligibility criteria for mainstream is the age and disability requirements. You have to have one household member that is age 18 to 61 and temporarily up to age 62 when they sign the HAP contract and is a person with disabilities that meets the definition. So just really trying to stress the definite-- difference between preference and eligibility criteria. So you're maybe-- not all the people that you serve are going to meet preference criteria, but all of them are going to meet the eligibility criteria.

So someone asked should they be in separate funds, even if we track them on the same field in VMS. I think they're referring to different awards of mainstream vouchers. And I just-- you know, I just want to stress that all mainstream vouchers-- like, we haven't asked for any difference in reporting of mainstream funding.

Now I know there's-- notice 2020-2024 I believe that talks about some of the CARES Act funding, and sort of how to report that. But for mainstream vouchers in the VMS, you know, all the funding that we're awarding is actually awarded-- was appropriated through the Appropriations Act. None of it-- none of this HAP funding-- so not talking about admin fees, because we did get CARES Act admin fees for mainstream.

But all of the housing assistance payment funding for mainstream, all of this funding that we're putting out now and all from the NOFAs, that all came from the regular Appropriations Act. And we're not asking for any kind of differentiation in how you are reporting that. That should all be going in VMS in the mainstream five year fields and in PIC. Please mark them as MS5. And we have had some situations where we haven't been giving credit to some PHAs for utilizing their vouchers because they're not reporting them properly.

So it's really important that you let us know at HUD through your reporting in VMS and PIC so that we can give you credit for the hard work that you're doing. That is obviously going to be a big issue with renewals too. You need to report as how much funding you're using for mainstream, and make sure it's in the right spot so we get you the renewal funding that you need every year.

All right. Let me go down to the bottom to get more-- some more recent questions. So someone asked what's the guideline if a participant with a mainstream voucher

expresses interest in joining the FSS, family self-sufficiency program? That is-- that's encouraged.

It's totally fine. I would-- you just think about mainstream as just any of your other vouchers. That should be allowed for them to participate in the FSS program just like any other voucher holder.

Someone asked can we switch a family to a regular voucher if the-- let's say you have a mainstream voucher, the eligible person left, and the PHA has a regular voucher that they would like to switch the family to, that's totally fine. So you had a mainstream voucher that you were assisting, eligible person left, you want to retain that mainstream voucher, and you have the regular voucher available, you can switch them to a regular voucher, because that's sort of more where they fit now. But if you don't have the vouchers available, then you can also leave them as a mainstream participant because we don't want to terminate assistance for families just because that eligible member had to leave.

So someone asked what do we do if we are having trouble finding people who qualify? This is where it's a great time to reach out to agencies in your community that might be able to help. Just recently for the NED 2 program we were able to put a PHA in touch with another agency, a Center for Independent Living, that was able to help them some referrals for their program. I think there's certainly center for independent living, if you have one locally, your local health department-- I think we're hopefully going to cover that a little bit more in the next training. But there's definitely ways to try to recruit people who, if you're having trouble finding eligible folks.

So someone said we don't have any mainstream vouchers available. Can a mainstream voucher port to our jurisdiction and be turned into a regular voucher? Absolutely. So you have a mainstream person that wants to port. We offer the same rights to everyone. Everybody has the ability.

You know, every tenant on the voucher program, whether they're mainstream or not, has that right of portability. And you would take that-- you could absorb them as a regular voucher. You could also build for them for the mainstream voucher. But if you're absorbing them, of course, you're going to be absorbing them as a regular voucher.

That's OK. Let's see. I think I've answered a lot of these, because we're getting a lot of questions that are duplicates, which is great that a lot of people had the same question and we were able to answer them. Just skimming through to see--

So does HUD intend to award all remaining 2018 and 2019 appropriated funding through the most recent opportunity? Will there be additional opportunities to apply in 2021? So we've made \$150 million available through this 2020-2022 notice. That is really the bulk of the funding that is left over.

I mean there's a chance that we could have a small NOFA. But it would be very, very small compared to the ones we've been able to offer up until now. I don't know of any plans for additional appropriations. We've already received so much in new appropriations. It's kind of unprecedented.

So I would say the outlook for another NOFA in 2021 is not that good. I mean, we are unlikely to have a lot more money to provide to give to PHAs. So 2020-2022 is going to be the big opportunity. So I would definitely urge everybody if you're interested, to get your application in as soon as you can.

Do you know if the CARES Act funding can be used to assist the family with getting utilities on in their units? I can't answer that question in terms of admin fee funding. I know for sure for the HAP funding, which is what we are awarding through 2020-2022, it can't be used for that. That's strictly for housing assistance payment funding. But it's definitely worth asking and checking out our FAQs on the COVID-19 FAQs.

So PIH has a whole set of many, many pages of FAQs. And I believe this question is answered on there. But I don't know the answer off the top of my head.

Ooh, so if we have an older war of NEDs, are we supposed to mark those MS5 under special purpose? No. So this is really important. We went over the difference between NED and MS5 mainstream.

It's really important that you all find out which-- if you're confused about whether or not you have NED or MS5, because you've had them for a really long time, you can reach out to your financial analyst at the Financial Management Center-- at HUD'S Financial Management Center-- and you can find out which vouchers you actually have. But please, if you have NEDs, you're going to keep calling-- you're going to keep referring to those as NEDs on the 5/8 and reporting them with your regular vouchers in VMS. And I think there's maybe a call out for NEDs. But don't report those as MS5 or mainstream 5 in VMS.

OK. So this person asked, the housing authority was awarded 2019 mainstream NOFA award in December 2019. And they gave funding for only the first three months of 2020 and then they stopped. The housing authority has not leased any of the mainstream vouchers as of today. What happens to the award?

So I'm glad someone brought that up. If you work at this housing authority, you can-- and if you aren't sure, you can also email-- well, first of all, the award letter explains why you received three months and then stopped. The award letter is-- the award is structured so that we're going to-- HUD we'll give you three-- HUD will give you three months worth of 1/12 disbursements of your full award. Then we're going to look at have you least enough in order to need that funding.

If you don't need that funding, we're keeping that in HUD-held reserves. So it's still been allocated to your housing agency. It's just being kept in HUD-held reserves for your agency. We're going to go ahead and continue to hold onto that until you reach that leasing. We've had some-- in the NOFA, we said if-- you need to reach 80% utilization within the first year, or we might take back funding.

In the FAQs for COVID that I referenced before on-- you can probably Google PIH COVID FAQs. We addressed that and said we're at least giving an additional six months. So you would need to make sure you are able to lease those vouchers in 18 months from the date they became effective.

So if you don't have your award letter, you can email your financial analyst at the FMC, or you can send an email to mainstream vouchers at HUD.gov. Then we can get to your award letter so that you can see sort of how that disbursement schedule is planned. But it doesn't mean that your award has stopped and you still have access to the funding if you do start leasing. So-- And, let's see.

All right. Somebody said, does the funding for mainstream vouchers differ than regular vouchers, meaning if a PHA is allocated or allotted 25 mainstream vouchers, are we going to be funded to utilize all of the vouchers? Or does it run on the dollar amount funded? This is a really wonderful question, because it's so important.

There are two ceilings. You have a ceiling of the number of vouchers you've been allocated. And you have a ceiling of the amount of funding that you've been allocated. So your award letter is going to have a number of vouchers and an amount. That's how much you've received.

So if you run-- if you come up to your spending limit before you've leased the number of vouchers and you need to stop leasing-- so it's a budget-based program. And you got to keep a lookout for all that. We've also had some PHAs that have leased too many vouchers. And the rules there are if you leased more than your UMAs-- your annual UMAs-- then the PHA has to come up with the funding to cover those UMAs, even if they had funding left in their program. So it's a double-cap, a double ceiling that you have to watch your annual UMAs and your budget authority. You got to monitor both of them.

Somebody asked what's a reasonable number of vouchers to request if you administer mainstreaming in another county? I mean, I would really like for PHAs to think about how many vouchers can they-- for this other county or for their own county-- how many vouchers can they administer in a year, lease up in a year? So we have in 2020-2022 caps on how many you can request or how many we would fund based upon your PHA size. But I think it's also important to think is that maximum really realistic for you?

And we said in the notice that we expect the vouchers to be leased up in the first year, especially because this is sort of an emergency situation with coronavirus that we've put this funding out here, and PHAs are opting into say, you know, we're ready we can administer these in sort of an emergency situation. So we are expecting that those PHAs will administer all of the funding and vouchers that they get in the first year. So that's sort of how you need to think through. I mean, it is very hard to figure, to estimate if you haven't had so many vouchers recently.

But you know, you can look your waiting list. How many eligible folks do you have on your waiting list? What's your typical voucher success rate? You know, I think the ultimate challenge with the voucher program is we also have to have suitable housing.

And if you have a low vacancy rate in your community, you know, you may have the need. But if you don't have the units, then that may not be realistic. So I think you have to look at all those things and make a reasonable guess for what you can achieve in a year.

Someone asked are mainstream vouchers funded annually? Currently, we do not receive funding to utilize the vouchers we have. So this is a really important time. And I should've brought it up already, but we do have-- everybody I assume, is familiar with the two-year tool. And we have a mainstream two-year tool now. And the mainstream two-year tool will kind of help you project whether or not you have enough funding.

I think without looking at your particular PHA situation, it's hard to say. But because you always-- you need to be looking at sort of the renewal funding that you can expect, you-- the way sort of the program works is let's say, you're a first time PHA administering mainstream. And let's say you get \$100,000 for 100 units. Well, if you only lease 10 of those units, and you only spend \$10,000, well, in the next renewal year, you're only going to get \$10,000 in renewals. But you have \$90,000 in HUD-held reserves potentially, or in your PHA-held reserves. That can help supplement that next year.

So you really have to think about it-- you know, all of the potential funds that you have through renewals and at those reserves, and projects out, which is why using the two-year tool is really helpful. And I would say, if you have a specific question about your funding, you can email mainstream vouchers at HUD.gov, and we can look through it and see if there is an issue there. OK.

When porting out, if the receiving PHA does not have the mainstream voucher program and does not have a regular voucher available, and the initial PHA does not have a regular voucher available to port, what happens? OK. So I think I'm understanding this as it's a person who has a mainstream voucher at the one PHA, and they try to port a PHA that doesn't have mainstream, and they-- the PHA doesn't have a regular voucher.

I mean, it sounds to me that what they would do is bill the-- if they don't have-- if the receiving PHA doesn't have a voucher available, they could build the initial PHA. So I assume that would be what happens. Not necessarily that there is a wait-list support. It would be more that they would just decide to fill the initial agency.

So another question about if you're overspending without full lease up, due the mainstream vouchers qualify for shortfall? So mainstream vouchers typically don't qualify for a shortfall. The CARES Act \$400 million, that was made up-- was it-- I think it was-- anyway, the CARES Act shortfall funding mainstream did qualify for that.

But I don't know going forward next year what the shortfall situation will be for mainstream. And so that's why we need basically an act of Congress in order to fix the short-- have a shortfall for mainstream. I'm not exactly sure what the situation is going to be. So we think it's really important that you monitor your spending on mainstream.

OK. If you applied for the new mainstream vouchers, how long does it take to hear if you are awarded them? We are trying to work really quickly on this. And we are hoping that we can respond to each PHA that applies within four to six weeks. We do have a process that we have to follow. And so we're hopefully getting through these as quickly as possible.

Can the mainstream vouchers be project-based? So, they can. The requirements are just like the regular program. But I think it's just important to think about any potential fair housing issues, because you are dealing with a population that would be 100% disabled. So when you're looking at any sort of project caps, you need to think about that when you're structuring your project-based voucher plan. OK.



So do you guys use the average per unit cost of current HAP vouchers to fund awarded mainstream vouchers? So, we definitely-- if we don't have data on your mainstream program, like you don't have a mainstream program, then we would look at your voucher per unit costs. And we're also going to look at what-- in this 2020-2022 opportunity, we ask PHAs to provide their-- we ask PHAs to provide what they think their PUC would be. And so we would look at that and their regular PUC. OK.

So I think we've covered a lot of questions. And we still have two webinars that we will have coming up. And we had a lot of questions about preferences. And so I definitely encourage everybody to call in for-- and sign up for the next webinar, which will focus more on preferences specifically. So thank you.

LIZ STEWART: Thank you Ashley. And I'll just real quick, go back to the slide that has when those additional webinars are taking place. And again, you'll be able to register for these.

So the next two webinars-- the next one's going to be on the NOFA preferences. And we'll really get into more of those details on the preferences, some of the questions. We'll look through the chat box and the Q&A to make sure that we give you as detailed answers as possible. And we can prepare for those in advance.

So that one will be November 18 at 1:00 PM. And then the next webinar after that will be December 14 at 1:00 PM. And that will be related to leasing during COVID-19.

I want to thank everyone for attending, and especially Ashley, thank you so much for taking the time to go through so many of those great questions that you all submitted. I hope everyone has a great rest of their afternoon. And we will see you and talk to you on the next webinar. Thank you.