

Mainstream Vouchers

Lessons Learned from Communities of Practice

Mainstream vouchers are tenant-based vouchers that assist non-elderly persons with disabilities and their families. The vouchers are a part of the Housing Choice Voucher (HCV) program and follow the same regulations and program policies as the PHA's regular HCV program except that these vouchers assist a special population. This topic provides "lessons learned" from HUD sponsored Mainstream voucher Communities of Practice.

I. Introduction

The Department of Housing and Urban Development (HUD) is committed to furthering the goals of [Olmstead](#) and the Americans with Disabilities Act by helping people with disabilities live in the community. Public housing agencies (PHAs) across the country have assisted nearly 50,000 people with disabilities using Mainstream vouchers. Funding is already allocated to support assistance for another 18,000 families. Many PHAs use Mainstream vouchers successfully to help people with disabilities transition from institutions or homelessness to a home in the community — but others are challenged to sustain high utilization rates.

In order to better understand the challenges facing PHAs in administering the program, HUD conducted three peer-to-peer communities of practice (CoPs): one each in Minnesota and Connecticut with local PHAs, and one solely for state PHAs. Thirty-four PHAs participated in the three CoPs, including PHAs with urban, suburban, and rural geography. This brief shares some of the lessons learned from these CoPs.

II. Overview of Challenges

PHAs participating in these CoPs identified challenges that occurred throughout the different phases of program implementation and administration. This included challenges experienced at the initial outreach and application stage to approve eligible applicants as well as challenges these households faced once they were issued a Mainstream voucher.

Application

PHAs found that eligible households faced challenges **completing program applications**. PHAs in the CoPs indicated that applicants to the Mainstream voucher program required a longer time to secure paperwork, such as income documentation. The reasons for this problem included a lack of understanding of the application process and delays at the source (such as the Social Security Administration, especially during COVID).

Housing Search

Once issued a voucher, many households faced challenges in housing search. In tight rental markets especially, those who have a **poor tenancy or criminal record** were often screened out by property managers. Data also suggests that people with disabilities faced an inordinate amount of **housing discrimination**. In 2021, 60% of the fair housing complaints received by HUD concerned disability.

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Many participants were also **hampered by insufficient financial resources necessary to “close the deal” such as application fees or a security deposit.** [HUD PIH Notice 2022-07 was issued after the CoPs began](#) so these PHAs did not yet have access to the additional administrative funds that could be used for these purposes (see box below). Further, as described below, Mainstream voucher participants were often competing in tight rental markets with voucher holders who did have funds for fees and security deposits and whose programs may also have provided landlord incentives — and who could provide these payments very quickly. Connecticut PHAs, for example, complained that many units were lost because the primary funding source for security deposits was unable to issue checks fast enough.

Unit Identification

Once issued a Mainstream voucher, participants in these states faced challenges similar to those faced by participants in other rental assistance programs such as Housing Choice Voucher (HCV), Emergency Housing Voucher (EHV), state rental assistance, and Continuum of Care (CoC) rapid rehousing programs. These include **lack of supply**, especially in rural areas, and fierce competition for the rental housing stock that is available. The lack of supply not only made unit identification challenging but often also resulted in **increased rents**.

Other unit identification **challenges were unique to the target populations** including the types of units needed:

- Lack of units that are partially or fully accessible for persons with physical disabilities and inability to locate accessible units that do exist in the community;
- Limited inventory of one-bedroom units in nonelderly, nonsubsidized properties;
- Lack of units near needed medical and supportive services; and
- Lack of units near public transportation, including accessible public transportation.

Case Management Supports

The overarching PHA feedback, however, was that **applicants who do not have the assistance of a case manager or other advocate** are often unable to successfully complete the application process or to successfully secure a qualified unit without multiple extensions of housing search time — or sometimes at all.

PHAs also reported housing retention as a challenge for tenants who do not have case management or access to ongoing supports, or who do have these but are unwilling or unable to benefit from the supports to prevent crises or to take advantage of them when faced with a tenancy crisis.

III. How PHAs Have Addressed Challenges

Through the CoPs, HUD identified a number of strategies PHAs used to successfully address these Mainstream voucher implementation challenges.

Partnerships

As described in HUD's brief, "[Mainstream Vouchers: Serving People with Disabilities at Serious Risk of Entering or Transitioning Out of Institutional Settings](#)," developing and sustaining partnerships at the state and local levels will assist PHAs to utilize Mainstream vouchers because these partners can help achieve effective outreach and referrals; affordable and accessible housing search; timely transition to a unit; and ongoing access to supportive services and tenancy supports.

Some of the activities that help to create and sustain PHA partnerships with service partners include:

- Identifying key points of contact and updating these when staff changes occur
- Engaging in level-setting including letting partners know which activities the programs can and cannot undertake
- Meeting regularly and as often as needed to identify challenges and discuss solutions
- Entering into a memorandum of understanding (MOU) or other written protocol to memorialize roles and responsibilities and to establish mutual goals and methods to review progress

See the boxes below for examples of PHA-service partnerships that led to successful Mainstream lease-ups.

Dakota County Community Development Authority (CDA), Minnesota

The Facts

- 26 Mainstream vouchers. 100 percent leased. Only one participant has returned to homelessness.
- HCV Administrative Plan includes preferences for four categories: people coming from or at risk of institutionalization and people experiencing or at risk of homelessness. Referrals are prioritized by vulnerability.

The Partners

- County Department of Social Services (DSS) is the primary partner; DSS has contracts with many service providers. Nine service providers are connected to the Mainstream voucher program!
- Service partners assist with identifying applicants, completing applications, and securing documentation. Partners secure services for those who want/need them, but who did not have them coming into the program.

The Tools

- Memorandum of understanding
- Single point of contact
- Regular meetings initially

Department of Housing (DOH), State of Connecticut

The Facts

- 453 Mainstream vouchers - 81% leased. 300 NED vouchers - 100% leased.
- The agency incorporated a preference into its HCV Administrative Plan to target persons who are chronically homeless.

The Partners

- The state housing agency works closely with two partnerships: Money Follows the Person Program serving people who are exiting or at risk of entering institutions, and the Coordinated Access Network (CAN) serving people experiencing or at risk of homelessness.
- The Money Follows the Person (MFP) demonstration supports state efforts for rebalancing their long-term services and supports system so that individuals have a choice to live and receive services in the community rather than in an institution. From the start of the program in 2008 through the end of 2020, states have transitioned over 107,000 people from nursing facilities and other institutional settings to community living under MFP.
- MFP programs provide comprehensive supports to help people with disabilities transition to the community. This can include **case management support** for applying and searching for housing, negotiating with landlords, making reasonable accommodation requests, and funding access modifications, as well as providing tenancy supports and services. MFP provides supports for up to a year; after that year, participants are bridged to Medicaid funded long-term supports.

Check out these videos to meet two individuals who have successfully transitioned to the community with the support of their MFP programs.

- [“Finding Home \(Kansas\)”](#) (5 mins) is an MFP Rebalancing Demonstration participant video from rural Kansas that documents the transition of a young woman from an intermediate care facility for individuals with intellectual disabilities (ICF/IID) to community placement and the use of home- and community-based services.
- [“Finding Home \(Michigan\)”](#) (5 mins) is an MFP Rebalancing Demonstration participant video from Michigan that documents the transition of a single father from a nursing facility to community placement and the use of home- and community-based services.

Landlord Incentives

In competitive rental markets, PHAs can level the playing field for people with disabilities including those transitioning from institutions or homelessness by leveraging landlord incentives. The box below includes examples of financial and nonfinancial resources that PHAs or their service providers may be able to offer, and that can act as incentives for the landlords in your community.

Financial Incentives	Nonfinancial Incentives
<ul style="list-style-type: none"> • Lease-signing bonuses • Extra security deposit • Holding/vacancy fees • Help with minor repairs • Risk mitigation funds (reimbursement for repairing damages) 	<ul style="list-style-type: none"> • Staffing landlord liaison to respond to questions and tenancy issues • Quick inspection process to reduce turnover time • Quick and timely processing of checks • Offering tenancy education to clients • Proactive check-ins to prevent and resolve tenancy issues • Tenancy support to avoid eviction • Community impact and recognition

There are many sources of potential funds for the financial incentives noted above. Some of these resources may be available only to a specific target population.

- Through [PIH Notice 2022-07](#) HUD made available \$500 per Mainstream voucher awarded through the FY2017 and FY 2019 NOFAs as well as each noncompetitively awarded Mainstream voucher. [PIH Notice 2022-18](#) then allowed that both the extraordinary administrative fee and regular HCV administrative funding could be used for costs related to the retention, recruitment, and support of participating owners in the form of security deposits, signing bonuses, vacancy payments, and damage mitigation.

Examples of how PHAs are using the HUD-awarded extraordinary administrative fees:

- Staff time for onboarding, housing search, and leasing
 - Last resort for security deposits and landlord incentives
 - [Beyond Backgrounds](#), a program providing landlords with up to \$2,000 of financial assurance if something goes wrong like damage to the unit or legal fees.
 - Reassigning staff to allow for more time for unit identification and partner collaboration
 - Designating staff to assist applicants with the application process including securing documentation, contacting landlords, and identifying housing stability resources
 - Signing bonuses to landlords
- As of January 1, 2022, MFP programs can use [supplemental services](#) to cover costs associated with securing housing. Under the MFP demonstration, supplemental services are one-time services that support an MFP participant’s transition from a nursing facility, and that are otherwise not allowable under the Medicaid program. These costs may include apartment application fees, administrative fees, and short-term rental assistance and utility expenses, but *cannot* include landlord incentives.
 - Emergency Solutions Grant (ESG) and ESG-COVID-19 (ESG-CV) resources can be used for landlord incentives for people experiencing homelessness. CoCs may also have other local sources of financial incentives for this target population.
 - Community Development Block Grant (CDBG) and CDBG-CV, American Rescue Plan Act (ARPA), other state, local, and county funding as well as foundation funds may be used to provide financial incentives for landlords.

More information on monetary incentives can be found in HUD’s Public and Indian Housing [Landlord Handbook](#).

Accessible Housing

As described above, locating accessible units can be challenging for Mainstream voucher participants. However, PHAs in the CoPs reported several successful strategies:

- [MyHousingSearch.com](https://www.myhousingsearch.com) is a portal for rental listings in an estimated 40 states and local communities. These webpages allow the housing seeker to search for rental apartments statewide or in specific communities. The websites are free. Users can search specifically for accessible units that meet the rent limitations of their voucher.
- Some states and communities have developed their own housing search tools. These include [Housing Navigator Massachusetts](#), [Housing Link](#) in Minnesota, and others. Check with your state or local community development agency to learn whether they have a housing search tool.
- New and rehabilitated units come online every year through each state's Low Income Housing Tax Credit (LIHTC) program. Federal fair housing laws require that new or substantially rehabilitated properties provide units that are accessible or have universal design elements. In addition, properties receiving LIHTC are required to accept HCVs, including Mainstream vouchers. Contact your [state housing finance agency](#) to secure a listing of these properties.

Voucher Participant's Right to Make Access Modifications

What's a reasonable modification?

A reasonable modification is a structural change made to existing premises, occupied or to be occupied by a person with a disability, in order to afford such person full enjoyment of the premises. Reasonable modifications might include structural changes to interiors and exteriors of dwellings and to common and public use areas. Examples include the installation of a ramp into a building, lowering the entry threshold of a unit, or the installation of grab bars in a bathroom.

Owner Obligations

Under fair housing laws, landlords must allow reasonable modifications when necessary to provide someone with a disability an equal opportunity to use and enjoy housing. The modifications must be necessary due to a disability, and they must be reasonable. Modifications are generally considered reasonable if they do not fundamentally alter the nature of the program and do not impose an undue burden on the landlord. Generally, in private housing that does not have any federal funding, tenants must pay for the cost of any reasonable modification.

Note that at this time, properties that have received Low Income Housing Tax Credits are not considered to have received federal funding for purposes of fair housing law.

Some states have passed stricter fair housing laws that may include other requirements. For example, Massachusetts requires owners of ten or more units to make and pay for reasonable modifications even if they do not receive federal funds.

Potential Sources of Funds to Help Mainstream Participants Pay for Home Access Modifications

- **Medicaid "Money Follows the Person" (MFP) Demonstration:** The MFP program includes options for paying for accessibility modifications. Note that under the [Supplemental Services Notice](#), MFP programs may cover payment for services and activities such as home accessibility modifications prior to an individual’s transition from an institutional setting.
- **Medicaid Home and Community Based Services Waivers:** If the state has included home or environmental modifications as a waiver service, this service is available to persons enrolled in the waiver who need modifications to their living environment in order to move to or remain in the community. Basic information about each state’s approved waivers is available [here](#).
- **Centers for Independent Living (CILs):** Your [local Center for Independent Living](#) is a good source of information including funding regarding accessibility modifications.
- **National Directory of Home Modification and Repair Resources:** The [National Directory](#) outlines each state’s home modification policies, funding sources, and programs.
- **State Vocational Rehabilitation Programs:** These [state programs](#) provide accessibility modification assistance.
- **State Assistive Technology Programs:** The Assistive Technology Act supports state [programs](#) to provide assistive devices and opportunities for loans and financing to individuals with disabilities.

V. Conclusions

Implementation of the Mainstream voucher program can be challenging for PHAs because to be successful, the eligible population — people with disabilities coming from or at risk of institutionalization and people experiencing or at risk of homelessness — require support that PHAs do not generally provide. PHAs report that applicants with no case manager or other advocate are often unable to successfully apply for and participate in the program. Partnerships with service providers that can support people with disabilities through application, housing search, move-in, and tenancy have proven effective. HUD’s extraordinary administrative fees and HCV administrative fees can both be used to support these activities. The MFP program is a good match for Mainstream vouchers, providing a pipeline of potentially eligible people with disabilities who have access to funds and services to address the program implementation challenges described in this brief. PHAs with underutilization of Mainstream (and/or Nonelderly Disabled (NED)) vouchers should consider reaching out to their state MFP program.

VI. Additional Resources

Topic Guides	HUD Guidance	Notices/Regulations
<ul style="list-style-type: none"> • Mainstream Vouchers Basics • NOFA Preferences & Waiting List Management • Serving Persons at Serious Risk of Entering or Transitioning Out of Institutional Settings 	<ul style="list-style-type: none"> • FY17 NOFA FAQs • FY19 NOFA Q&A • PIH’s Mainstream Voucher Page • HCV Guidebook 	<ul style="list-style-type: none"> • 24 CFR Part 982-HCV Tenant-Based Regulations • PIH Notice 2022-19 • PIH Notice 2020-01 • PIH Notice 2013-15