

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT WASHINGTON, DC 20410-5000

**SPECIAL ATTENTION OF:** 

Office Directors of Public Housing; Regional Directors; Public Housing Agencies NOTICE PIH 2024-XX

Issued: January XX, 2024

Expires: This notice remains in effect until amended, superseded or rescinded.

Cross References: Notice PIH 2023-07 and PIH Notice 2022-18

Subject:Registration of interest for special administrative fees for development of a<br/>housing mobility-related services plan (HMRP) under PIH Notice 2023-07:<br/>Implementation of Federal Fiscal Year (FFY) 2023 Funding Provisions for the<br/>Housing Choice Voucher Program

#### 1) **Background**

The Housing Choice Voucher (HCV) program allows participating families to use their assistance anywhere in the country where a Public Housing Agency (PHA) administers vouchers. While the HCV program serves over 2.5 million families with rental assistance, and families may use their assistance anywhere, families may face significant barriers accessing low-poverty neighborhoods.

Recent research shows growing up in neighborhoods with lower levels of poverty improves children's academic achievement and long-term chances of success and reduces intergenerational poverty. Adults given the chance to move to low-poverty neighborhoods may experience reductions in obesity and diabetes. In recognition of this growing evidence base, PHAs have expanded their efforts to promote housing opportunities in a wider range of communities, and especially in low-poverty areas. These activities include increased payment standards in opportunity areas, longer voucher search times, streamlined HCV program operations, and other administrative policies. While current HCV statutory provisions and program regulations<sup>1</sup> allow PHAs to provide housing mobility-related services to HCV families with children, providing these robust services to a large number of families is costly.

HUD has increased its efforts in supporting robust housing mobility programs, through the Community Choice Demonstration (CCD), which is currently supporting comprehensive housing

<sup>&</sup>lt;sup>1</sup> See PIH Notice 2022-18, "Use of Housing Choice Voucher (HCV) and Mainstream Voucher Administrative Fees for Other Expenses to Assist Families to Lease Units"

mobility programs in eight communities, and a recent \$25 million Notice of Funding Opportunity (NOFO) for Housing Mobility-related Services, which is supporting programs in seven communities.

In preparation for the NOFO issuance, HUD conducted listening sessions with HCV participants, PHAs, advocates, industry groups, and others to learn more about how HUD can help expand housing opportunities for HCV families. During the listening sessions, a common comment was related to the need for adequate time and careful planning to launch a comprehensive housing mobility program and participants encouraged HUD to find ways to fund planning opportunities for PHAs interested in these types of programs.

To further support the expansion of comprehensive housing mobility programs, Section 6(c)(D)(viii) of PIH Notice 2023-07, "Implementation of the Federal Fiscal Year (FFY) 2023 Funding Provisions for the Housing Choice Voucher Program" provided that HUD would issue a notice describing how Public Housing Agencies (PHAs) administering tenant-based Housing Choice Vouchers (HCVs) may apply for special administrative fees to support development of housing mobility-related services plans (HMRP). This notice implements that provision. HUD anticipates making approximately \$1.5 million in HMRP special administrative fee awards, with an estimated award size of approximately \$60,000.

This notice describes the following:

- Planning requirements and uses of special administrative fees
- Financial reporting requirements
- Eligibility criteria
- Registration of interest submission requirements
- Award process

## 2) <u>Planning Requirements and Uses of HMRP Special Administrative Fees</u>

#### Planning Requirements

Planning funds are important for helping PHAs launch and implement a successful housing mobility program. Developing a housing mobility plan helps PHAs interested in housing mobility to develop a comprehensive strategy to provide meaningful access to opportunity areas. The overall purpose of these funds is to help ensure that:

- PHAs are prepared prior to implementing housing mobility-related services;
- PHAs analyze the location of voucher holders and areas of opportunity in their jurisdiction and regional housing market;
- PHAs create an actionable and scalable plan for implementing housing mobility-related services, including developing a sustainable funding strategy;
- PHAs explore and adopt administrative policies that promote moves to opportunity areas; and
- PHAs are committed and engaged in the provision of housing mobility-related services.

PHAs that are awarded HMRP funds under this notice must develop a written housing mobility plan, which must include, at a minimum:

- A description of the PHA's commitment to helping HCV families with children access opportunity areas throughout the regional rental market, including outside the PHA jurisdiction through portability or partnerships;
- Listing of identified opportunity area designations and a map;
- Services to be offered and whether they would be provided in-house or through a thirdparty provider;
- Target number of families to be served monthly and annually;
- Description of how the PHA will ensure PHA payment standards are adequate in identified opportunity areas;
- Administrative policy changes adopted, or to be adopted, by the PHA that help support and maintain moves to opportunity areas; and
- A discussion of current and potentially available funding sources that could be leveraged to implement the HMRP.

In developing their housing mobility plan, PHAs must engage staff, community partners, and program participants. PHAs may use outside consultants to assist with the development of the plan.<sup>2</sup> PHAs are encouraged to review the recently published "<u>Housing Mobility Toolkit</u>" on the HUD Exchange website.

When developing their HMRP, PHAs are reminded that it must follow all applicable nondiscrimination and equal opportunity requirements at 24 CFR 5.105(a) and 24 CFR 982.53, including but not limited to the Fair Housing Act, Section 504 of the Rehabilitation Act of 1973, Title VI of the Civil Rights Act of 1964, the Age Discrimination Act, HUD's Equal Access Rule, Title II of the Americans with Disabilities Act of 1990, and the Violence Against Women Act. These requirements prohibit discrimination on the basis of race, color, religion, sex (including sexual orientation and gender identity) familial status, national origin, disability, age, and marital status. PHAs must also comply with Title III of the Americans with Disabilities Act of 1990 (see 28 CFR 35.160 and 28 CFR 36.303). Recipients and subrecipients must also provide effective communication for individuals with disabilities. Auxiliary aids or services and reasonable accommodations must be provided to ensure equal participation by individuals with disabilities. Recipients and subrecipients must take reasonable steps to ensure meaningful access for persons with limited English proficiency (LEP) pursuant to Title VI of the Civil Rights Act of 1964 and Executive Order 13166.<sup>3</sup>

PHAs must submit an interim report, which is a narrative update detailing progress on the housing mobility plan, twelve months after the award, or the mid-point of the anticipated

<sup>&</sup>lt;sup>2</sup> Subject to available funding, HUD may offer technical assistance directly to awardees or through its technical assistance providers. HUD may also facilitate a community of practice for HMRP awardees. Participation in technical assistance or the community of practice, if offered, is optional.

<sup>&</sup>lt;sup>3</sup> For assistance in ensuring meaningful access for individuals with limited English proficiency, recipients and subrecipients should consult HUD's Final Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons (HUD's LEP Guidance) published in the Federal Register on January 22, 2007 (72 Fed. Reg. 2732).

planning process, whichever is earlier. HUD may issue a specific reporting template for submission of the housing mobility plan and the interim report and will communicate any template via email to the PHA's identified main point of contact. In addition, PHAs may be requested to attend quarterly progress meetings with HUD staff.

PHAs must submit and present their housing mobility plan to their board or equivalent oversight entity for approval. After obtaining board approval, PHAs must submit their written housing mobility plan to HUD. The housing mobility plan must be submitted no later than eighteen months after the award date.

### Uses of HMRP Special Administrative Fees

HMRP funds may only be used for the development of a housing mobility plan. This following are eligible uses of these special administrative fees:

- Costs associated with the development of housing mobility plan, including personnel costs, consulting services, resident engagement and other activities that are directly related to the development of the housing mobility plan.
- Costs associated with the development of a Regional Project-based Voucher Plan (RPBVP) as part of the HMRP.
  - A PHA may also, but is not required to, use a limited amount of HMRP funds to develop a RPBVP. A RPBVP is intended to help PHAs expand the use of PBVs in high opportunity neighborhoods in the regional rental market. Ideally, the planning process includes all PHAs administering vouchers in the rental market. For a PHA that chooses to develop a RPBVP, it must be submitted to HUD as part of the housing mobility plan. The RPBVP must include, at a minimum, (1) an analysis of PBV units that are large enough for families with children and are currently in opportunity areas in the region and (2) a strategy for increasing the number of those types of PBV units throughout the region. While drafting their plans, PHAs should analyze barriers to increasing the number of family PBV units in opportunity areas and how to overcome those barriers. PHAs may use no more than 25% of their award toward the development of a RPBVP.

HMRP special administrative fees may only be used for the purposes discussed immediately above. Examples of ineligible uses of HMRP special administrative fees include, but are not limited to:

- Direct mobility-related services or other services provision to program participants
- Incentive payments to landlords
- Administrative purposes of the HCV program unrelated to developing a housing mobility plan for providing meaningful access to opportunity areas
- Housing Assistance Payments (HAP)
- Food or beverages
- Pre-development or development purposes
- Activities not explicitly identified as eligible uses of HMRP special administrative fees.

#### 3) Financial Reporting Requirements

These special administrative fees have a 24-month period of availability. For Financial Data Schedule (FDS) reporting, unlike regular administrative fees, these special administrative fees may not roll into the unrestricted net position (UNP) and must be tracked and accounted for separately throughout the 24-month period of availability.

Similarly, PHAs will report special administrative fee expenditures in the Voucher Management System (VMS) using the Expense/Comments tab and report in Expense Amount Field 5. PHAs will enter the amount of the monthly expenses and add comments describing the eligible activity the funds were used for. The monthly expenses reported in this field will be used to reconcile the special fees and any unspent funds that will be returned to HUD. Contact your FMC Financial Analyst if you have questions about this expense field.

The funding provided through this notice may only be used for the purposes described in this notice. PHAs that do not comply with the requirements of this notice may have their HMRP funding recaptured and reallocated by HUD.

HUD will assess compliance with these requirements by confirming PHAs used not less than the award amount on the eligible uses described in this Notice. Funds not expended within 24 months of the award are subject to recapture and must be remitted to HUD.

HUD may provide additional reconciliation/closeout guidance closer to the end of the period of performance, if considered necessary.

## 4) **Eligibility Requirements**

In order to prioritize PHAs with the highest concentration of voucher holders in higher-poverty areas that are most likely to benefit from housing mobility planning, HUD has established specific eligibility requirements to receive the HMRP funds. A listing of eligible PHAs is provided in Attachment A. PHAs are eligible to receive funds if they meet the following criteria:

- 1. The PHA has at least 400 voucher households with children living in a qualified census tract, AND at least 25 percent of their total number of HCV families with children are living in a qualified census tract<sup>4</sup>; OR
- 2. The PHA applied for the Community Choice Demonstration or for funding under the Housing Mobility-related Services NOFO (FR-6700-N-87), which prioritized PHAs with high concentrations of voucher holders in high-poverty neighborhoods, subject to the following conditions: A. PHAs participating in the Community Choice Demonstration or that were awarded funds under the Housing Mobility-related Services NOFO (FR-6700-N-87) are not eligible to apply as some of their awards were for the same purpose as the funding available under this Notice; and B. PHAs that withdrew from the Community

<sup>&</sup>lt;sup>4</sup> Qualified census tracts, as defined by the Low Income Housing Tax Credit program, must have 50 percent of households with incomes below 60 percent of the area median gross income or have a poverty rate of 25 percent or more.

Choice Demonstration are not eligible to apply as they previously received funds for this purpose.

HUD determined eligible PHAs with an analysis of household data reported through the Information Management System/PIH Information Center (IMS/PIC) as of September 30, 2023. PHAs that are not on the list provided in Attachment A but have program data supporting their eligibility according to the criteria listed above, must notify <u>housingmobility@hud.gov</u> within 14 days of publication of this Notice.

## 5) <u>Registration of Interest Requirements</u>

HUD will email eligible PHAs a notice of eligibility. The email will be to the PHA executive director based on contact information in the Public and Indian Housing Information Center (PIC).

Upon receipt of the email, if the PHA is interested in being considered for HMRP funds, the PHA must complete the Registration of Interest via the DocuSign program and submit it to HUD. The PHA must certify they will (1) adhere to the planning requirements in this notice and (2) only use these special administrative fees for the eligible purposes in this notice.

PHAs will have 14 business days after receipt of the email to respond to the Registration of Interest. Registrations of Interest received after the deadline will not be considered.

## 6) Award Process

HUD will review all Registrations of Interest submitted by the deadline. If more Registrations of Interest are received than available funding will support, HUD will prioritize funding for PHAs with high utilization rates. HUD will use the utilization rate based on the higher of the PHA's funding or units utilization percentage. For HCV funding utilization, HUD's calculation will include both authorized budget authority and reserves. The data will be based on the latest available 2023 financial reporting in VMS.

HUD will notify the highest ranking PHAs via email of their award. At that time, HUD will also notify those PHAs not awarded.

## 7) Paperwork Reduction Act

The information collection requirements contained in this Notice have been approved by the Office of Management and Budget (OMB) in accordance with the Paperwork Reduction Act of 1995 (44 U.S.C. §§ 3501-3520) and have been assigned the following OMB control number – 2577-0169. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless the collection displays a valid control number.

#### 8) Further Information

Questions concerning this notice should be submitted by email to the following Office of Housing Voucher Programs mailbox: <u>housingmobility@hud.gov</u>

Richard J. Monorchio

Richard J. Monocchio Principal Deputy Assistant Secretary Office of Public and Indian Housing

# Attachment A: List of Eligible PHAs

		Number of Vouchers with a child in a qualified	Leased	Percent with
PHA Code	PHA Name	census tract	Vouchers	Children
AL001	Housing Authority of the Birmingham District	2,056	5,697	36%
AL002	Mobile Housing Board	1,247	3,891	32%
AL006	Housing Authority of the City of Montgomery	1,129	3,075	37%
AL047	The Housing Authority of the City of Huntsville	440	1,618	27%
AL086	Jefferson County Housing Authority	637	2,074	31%
AL125	HA Bessemer	144	529	27%
AL169	The Housing Authority of the City of Prichard	797	2,386	33%
AR002	North Little Rock Housing Authority	515	1,900	27%
CA006	Housing Authority City of Fresno	1,293	6,479	20%
CA023	County of Merced Housing Authority	655	2,180	30%
CA059	Housing Authority of the County Santa Clara	1,018	10,990	9%
CA068	City of Long Beach Housing Authority	911	6,578	14%
CA085	County of Sonoma	99	2,862	3%
CT001	Housing Authority of the City of Bridgeport	1,025	2,860	36%
CT003	Housing Authority of the City of Hartford	879	2,205	40%
CT006	Waterbury Housing Authority	598	2,074	29%
CT051	City of Hartford Housing Authority	995	4,723	21%
DE001	Wilmington Housing Authority	811	2,212	37%
FL002	Housing Authority of the City of St. Petersburg	971	3,278	30%
FL003	Tampa Housing Authority	2,828	10,592	27%
FL011	Housing Authority of the City of Lakeland	265	1,464	18%
FL028	Housing Authority of Pompano Beach	167	782	21%
FL079	Broward County Housing Authority	1,097	5,374	20%
FL119	HA Boca Raton	96	626	15%
GA004	Housing Authority of the City of Columbus	914	2,992	31%
GA006	Housing Authority of the City of Atlanta Georgia	5,200	17,737	29%
GA228	Housing Authority of the City of Jonesboro	408	1,447	28%
GA237	Housing Authority of the County of Dekalb, GA	989	3,871	26%
IL002	Chicago Housing Authority	13,675	51,067	27%
IL003	Peoria Housing Authority	413	1,731	24%
IL004	Springfield Housing Authority	617	1,926	32%
IL022	Rockford Housing Authority	469	1,634	29%
IL024	Housing Authority of Joliet	454	2,174	21%
IL030	St. Clair County Housing Authority	703	2,210	32%
IN003	Fort Wayne Housing Authority	799	2,599	31%

PHA Code	PHA Name	Number of Vouchers with a child in a qualified census tract	Leased Vouchers	Percent with Children
IN015	Housing Authority of South Bend	722	2,153	34%
IN015	Housing Authority of the City of Evansville	745	2,255	33%
IN010	Indianapolis Housing Agency	2,290	6,816	34%
KY001	Louisville Metro Housing Authority	3,090	10,711	29%
LA003	Housing Authority of East Baton Rouge	1,177	3,677	32%
LA005	Housing Authority of the City of Lafayette	591	1,603	37%
LA006	Housing Authority of Monroe	459	1,541	30%
LA270	Housing Authority of Jefferson Parish	890	4,024	22%
MA002	Boston Housing Authority	4,723	15,884	30%
MA005	Holyoke Housing Authority	422	1,572	27%
MA012	Worcester Housing Authority	1,164	3,474	34%
MA024	Brockton Housing Authority	478	1,771	27%
MD015	Housing Authority of Prince Georges County	833	5,597	15%
MD901	MD Dept. of Housing and Community Development	514	2,231	23%
MI001	Detroit Housing Commission	1,332	5,064	26%
MI006	Saginaw Housing Commission	437	1,172	37%
MI045	Plymouth Housing Commission	650	1,918	34%
MI058	Lansing Housing Commission	728	1,913	38%
MI901	Michigan State Housing Development Authority	6,070	28,433	21%
MN001	Public Housing Agency of the City of St Paul	1,588	4,265	37%
MO001	St. Louis Housing Authority	2,016	5,921	34%
MO002	Housing Authority of Kansas City, Missouri	1,774	7,094	25%
MO004	Housing Authority of St. Louis County	2,403	6,140	39%
MO203	St. Francois County Public Housing Agency	449	1,668	27%
MS019	Mississippi Regional Housing Authority No. IV	486	1,933	25%
MS030	Mississippi Regional Housing Authority No. V	466	1,759	26%
MS040	Mississippi Regional Housing Authority No. VIII	1,868	7,006	27%
MS058	Mississippi Regional Housing Authority No. VI	1,378	4,887	28%
NC001	Housing Authority of the City of Wilmington	407	1,313	31%
NC003	Housing Authority of the City of Charlotte	1,773	7,361	24%
NC006	Housing Authority of the City of High Point	447	1,232	36%
NC011	Housing Authority of the City of Greensboro	1,004	4,005	25%
NC012	Housing Authority of the City of Winston-Salem	1,313	3,399	39%
NC057	Gastonia Housing Authority	510	1,436	36%
NE001	Omaha Housing Authority	1,363	4,042	34%
NJ002	Newark Housing Authority	2,284	7,363	31%
NJ003	Elizabeth Housing Authority	259	1,110	23%

		Number of Vouchers with a child		
		in a		Percent
		qualified	Leased	with
PHA Code	PHA Name	census tract	Vouchers	Children
NJ912	State of NJ Dept. of Comm. Affairs	3,207	23,327	14%
NY001	Syracuse Housing Authority	1,129	3,512	32%
NY005	New York City Housing Authority	18,399	94,105	20%
NY009	Albany Housing Authority	774	2,447	32%
NY409	City of Buffalo	1,286	4,616	28%
OH001	Columbus Metropolitan Housing Authority	3,497	12,808	27%
OH003	Cuyahoga Metropolitan Housing Authority	3,910	12,830	30%
OH004	Cincinnati Metropolitan Housing Authority	3,563	10,348	34%
OH005	Dayton Metropolitan Housing Authority	1,245	3,864	32%
OH006	Lucas Metropolitan Housing Authority	1,118	3,817	29%
OH007	Akron Metropolitan Housing Authority	1,622	5,154	31%
OH012	Lorain Metropolitan Housing Authority	997	2,903	34%
OH015	Butler Metropolitan Housing Authority	475	1,654	29%
OH016	Mansfield Metropolitan Housing Authority	572	1,732	33%
OH018	Stark Metropolitan Housing Authority	460	1,306	35%
OK002	Housing Authority of the City of Oklahoma City	1,156	3,599	32%
OK073	Housing Authority of the City of Tulsa	1,817	5,808	31%
PA002	Philadelphia Housing Authority	7,249	19,055	38%
PA004	Allentown Housing Authority	458	1,598	29%
PA007	Chester Housing Authority	591	1,579	37%
PA008	Harrisburg Housing Authority	432	1,294	33%
PA023	Housing Authority County of Delaware	677	2,232	30%
RI001	Housing Authority Providence	855	2,362	36%
SC002	Housing Authority of the City of Columbia	1,060	3,852	28%
SC004	Housing Authority of Greenville	767	2,929	26%
SC057	Housing Authority of N Charleston	635	2,222	29%
TN001	Memphis Housing Authority	2,828	7,851	36%
TN003	Knoxville's Community Development Corp.	925	2,959	31%
	Kingsport Housing and Redevelopment			
TN006	Authority	296	1,371	22%
TN007	Jackson Housing Authority	488	1,325	37%
TX006	San Antonio Housing Authority	2,928	10,922	27%
TX008	Corpus Christi Housing Authority	1,118	3,297	34%
TX010	Housing Authority of the City of Waco	690	2,473	28%
TX073	Pharr Housing Authority	170	852	20%
TX433	Arlington Housing Authority	491	3,285	15%
UT003	Housing Authority of the County of Salt Lake	352	2,935	12%
UT004	Housing Authority of Salt Lake City	261	2,804	9%

PHA Code	PHA Name	Number of Vouchers with a child in a qualified census tract	Leased Vouchers	Percent with Children
VA006	Norfolk Redevelopment & Housing Authority	1,170	4,234	28%
VA007	Richmond Redevelopment & Housing Authority	1,065	3,382	31%
VA019	Fairfax County Redevelopment & Hsg Authority	315	4,779	7%
WA054	HA of Pierce County	221	2,518	9%
WI002	Housing Authority of the City of Milwaukee	1,615	5,764	28%