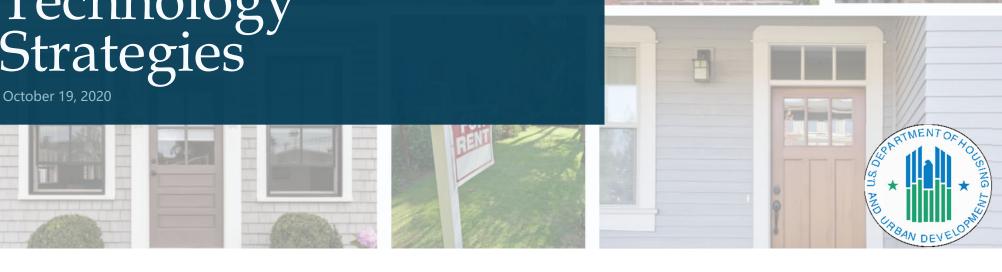
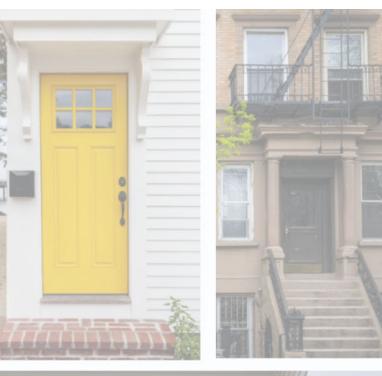
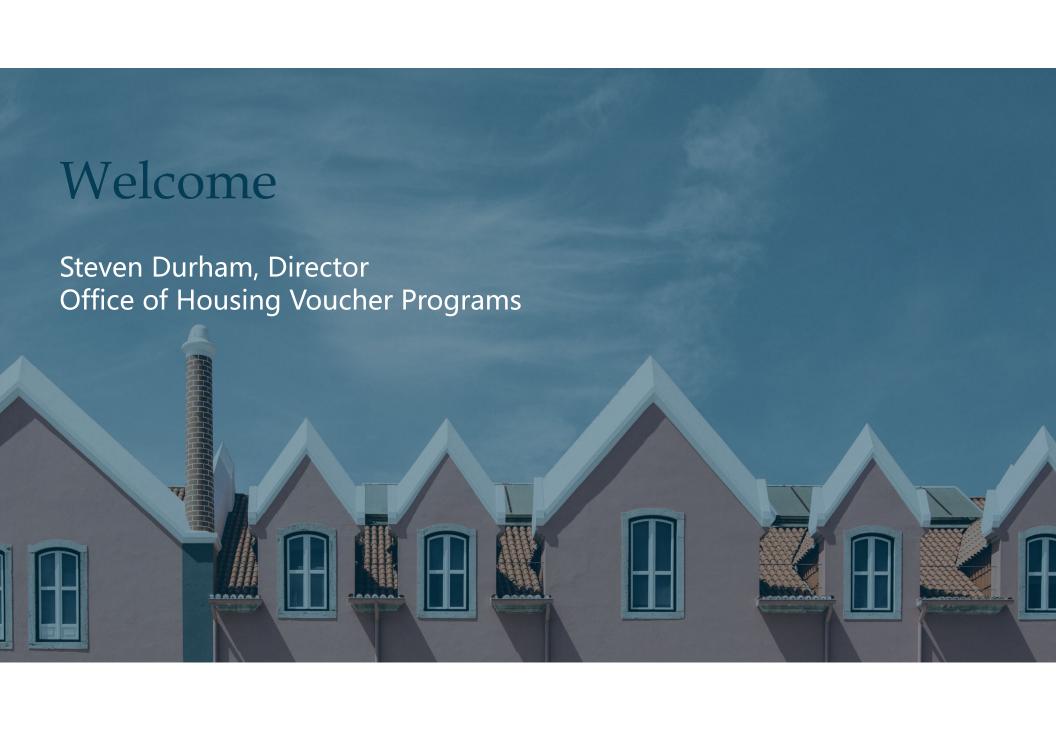


HCV Landlord Webinar 3: Technology Strategies







HCV Landlord Participation Webinar Series

- Webinar 1: Background and Introduction: Challenges Landlords Experience
- Webinar 2: Education and Outreach Strategies
- Webinar 3: Technology Strategies



Today's Webinar

WHAT TO EXPECT

- Overview of Landlord Strategies Guidebook for PHAs
- Technology Strategies
- PHA Profiles
- Additional HUD Efforts
- Conclusion and Q&A

Questions: Submit through the webinar chat function throughout the presentation



Guidebook: Purpose

To support public housing agencies (PHAs) in improving landlord participation in the Housing Choice Voucher (HCV) Program by:

- Increasing Recruitment
- Increasing Retention
- Improving Responsiveness
- Improving Tenant-Landlord Relationship
- Improving Inspections Process
- Minimizing Bureaucracy

Guidebook: How To Use

- Publishing Guidebook chapters on HUD's website as they are completed.
- Guidebook will be updated in its entirety once all chapters are published.
- Encouraged to read the entire chapter as many strategies in a chapter are related information that is transferrable.

Guidebook: Where to Find

- HUD HCV Landlord Resources
 - https://www.hud.gov/program_offices/public_indian_housi ng/programs/hcv/landlord
- Housing Choice Voucher (HCV) Landlord Strategies Guidebook for Public Housing Agencies



Technology

- Presents a range of strategies varying in cost and complexity
- Strategies include:
 - HCV Landlord Webpage
 - HCV Landlord Portal
 - Inspections Technology



TECHNOLOGY

INTRODUCTION

Technology facilitates multiple options for public housing agencies [PHAs] to improve their relationships with landlords, provide landlords with access to information previously only available by request or mail, and ease the concerns and frustrations surrounding the inspections process. Technology-focused strategies can range from simple, low-cost options such as adding information to a PHA website to high-tech software applications that can optimally route inspections appointments and provide real-time arrival updates to landlords.

The following strategies are included in this section:

- HCV Landlord Webpage
- · HCV Landlord Portal
- · Inspections Technology

Related strategies:

- Inspections
- · Education and Outreach

The strategies in this technology chapter address the following areas:

Technology Process Improvements

PHA Process Improvement	HCV Landlord Webpage	HCV Landlord Portal	Inspections Technology
Increase Recruitment	Х		
Increase Retention	Х	Х	Х
Improve Responsiveness	Х	Х	Х
Improve Tenant-Landlord Relationship	х	х	
Improve Inspections Process	Х	Х	X
Minimize Bureaucracy	Х	Х	Х

The contents of this document, except when based on statutory or regulatory authority or law, do not have the force and effect of law and are not meant to bind the public in any way. This document is intended only to provide clarity to the public regarding existing requirements under the law or agency policies

1 | HCV LANDLORD GUIDEBOOK



STRATEGY: HCV LANDLORD WEBPAGE

Providing information to landlords about the PHA and the HCV program on the PHA's website.

Who: PHAs with a mid-sized or larger HCV program that already have a PHA website. PHAs located in areas where landlords are used to finding information online.

Cost: \$ \$\$ Minimal for PHAs that already have and maintain a website.

Implementation Considerations: ● LOW ○ MEDIUM ○ DIFFICULT

- Examines how an HCV Landlord webpage can be used to:
 - Encourage landlord participation in the program
 - Address common questions
 - Empower landlords
- Makes HCV information relevant to landlords prominent
- Audience:
 - New Landlords Possibly the first exposure to the HCV Program
 - Existing Landlords Easy way to locate the HCV-focused information relevant to landlords

HCV Landlord Webpage Content

New or Prospective ≺ Landlords

- How to become a landlord in the HCV program
- HCV roles and responsibilities
- HCV process overview
- Calendar and training opportunities

Current HCV landlords

- Inspection information
- Payment standards and utility allowance schedules
- Property listings
- News

HCV Landlord Resources Webpage

HCV LANDLORD RESOURCES

The housing choice voucher (HCV) program is the federal government's primary program for assisting very low-income families, the elderly, and persons with disabilities to afford decent, safe, and sanitary housing in the private market. Since housing assistance is provided on behalf of the HCV tenant, participants are able to find their own housing, including single-family homes, townhouses and apartments. Housing choice vouchers are administered locally by public housing agencies (PHAs) that receive federal funds from the U.S. Department of Housing and Urban Development (HUD) to administer the HCV program. This means that the tenant, landlord and PHA all have obligations and responsibilities under the HCV program.

COVID-19 RESOURCES

- (UPDATED) PIH COVID-19 Frequently Asked Questions and Responses Relevant for HCV Landlords
- HCV Landlord Flyer Preventing Evictions During COVID

I am a Landlord and I Want to...

Learn more about the HCV Program

HCV Fact Sheet for Landlords

(NEW) Steps to Become an HCV Landlord

(NEW) Myth-busting and Benefits for HCV Landlords

Flowchart of HCV Lease Up Process for Landlords

List my rental property

Know how much rent will I receive

Know more about inspection requirements

HQS Initial Inspection Flowchart Biennial HQS Inspection Flowchart

bicilliai rigo inspection riowala

Learn about the tenant's obligations

Contact my local PHA

Resources for PHAs to Increase Landlord Participation

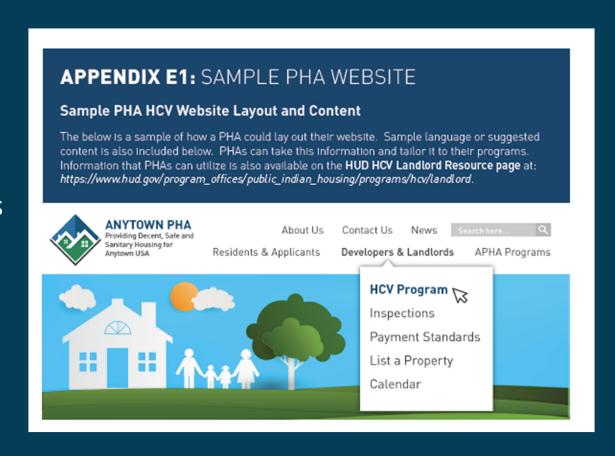
Landlord Participation Research and Studies

Forms

HCV Landlord Strategies Guidebook for PHAs

Implementation and Design Tips

- Easy to navigate menus and subtopics
 - Increased website access via mobile phones
- Links to documents, forms, or HUD HCV Landlord Resources Webpage
- Accessibility
- May require ability to edit quickly



STRATEGY: LANDLORD PORTAL

Providing information to landlords about their individual profile, units, payments, and tenants in a secure electronic website portal.

Who: PHAs that already use a vendor that provides portals, and PHAs that are considering investing in a portal (which includes tenant and PHA elements as well as landlord elements).

Cost: \$ \$\$ \$\$\$ Moderate for PHAs that already work with a vendor offering web-based services. May be more substantial for PHAs that do not currently work with a vendor, or would like to develop this feature in-house.

Implementation Considerations: ● LOW ● MEDIUM ○ DIFFICULT

- Provides landlords with secure, 24/7 access to information specific to their portfolio.
- Differs from landlord website, which is public and more general.

Landlord Portal Content

- Housing Assistance Payment (HAP) history and remittances by tenant and unit
- Housing Quality Standards (HQS) inspection appointment dates
- HQS inspection reports
- Status of rent increases
- Location to receive notifications and send messages
- 1099 tax forms

Implementation Considerations

- Cost
 - In-house or software vendor
 - Maintenance
- Additional Features
 - Download and submission of forms
 - Completion and submission of forms with electronic signature
 - Send and receive messages
- Training



New Hampshire Housing Finance Authority

Dee Pouliot, Managing Director

Gail Quinlan, Director of Program Operations

Profile:

- New Hampshire
- •4,037 vouchers

Landlord Portal



HCV Owner Portal Technology

Assisted Housing October 2020







Technology Strategy







STRATEGY/GOALS

IMPLEMENTATION AND DESIGN

ROLLOUT







CHALLENGES

NEXT STEPS

Q & A

HCV Owner Portal



Strategy/Goals

- Customer service for owners
- Streamline Tasks
- Savings
 - Staff time
 - Printing and postage

HCV Owner Portal



Implementation and Design

	Audit-Proof	
	Secure	
	Secure	
	HAP and financial records	
	Including 1099 and ACH information	
	Inspections	
•	Inspection results and history	
	• Inspection results and history	
	Tenant Summary and Changes in HAP	
	Include household members	
	Utility data	
	Rent Increases	
	Neitt illitieases	
	RFTA for new lease ups	
	- KITA for new lease ups	

HCV Owner portal

NHHFA.org



Rollout



Owners Manual



Created invitation letters with unique codes



Tested the portal instructions with a large multi-family owner/management company



Took our "show on the road"

Face to face demonstrations and more testing



Mailed 1800 invitation letters

HCV Owner portal



Results

- Landlord Response-
 - Confusion
 - Loved it
 - Hated it
 - Kept Trying
- Lots of phone calls and offers of help
- One Year Later
 - 548 registered owners out of 1800-30%
 - 2247 Tenants out of 3900-58%

HCV Owner portal



Challenges

- High level of security
- Landlords with limited computer experience
- Access is not 24/7
- Landlords with one tenant
- Change is hard

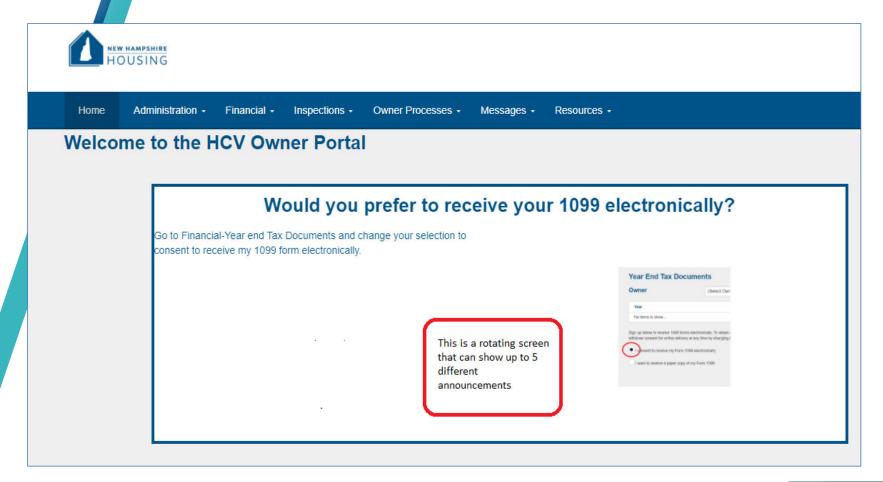
Next Steps

- Outreach
- Marketing
- Landlord customer service survey

HCV Owner portal



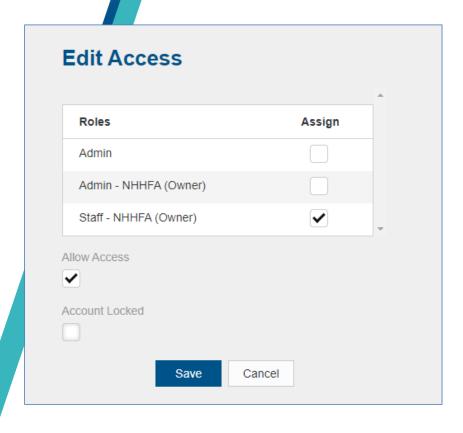
Home Page - Announcements



HCV Owner portal



Administration-Users



- Admin is created for each account
 - Admin controls access for their own users
 - Admin controls level of access
 - Can assign by property
 - Can group all their properties together

HCV Owner portal



Financial

- Direct Deposit Information
- HAP Payment History
- HAP Year to Date
- Tax Lien
- Year End Tax Documents

HAP Payment History

Amount	Backup Withholding	Tax Lien	Net Amount	
\$1,868.00	\$0.00	\$0.00	\$1,868.00	Details .pdf Payment Never Received
	Net Amount		Description	
	\$776.00		Test Client 1	
	\$1,092.00		Test Client 2	
\$2,679.00	\$0.00	\$0.00	\$2,679.00	Details Payment Never Received
\$2,679.00	\$0.00	\$0.00	\$2,679.00	Details .pdf Payment Never Received
	\$1,868.00 \$2,679.00	\$1,868.00 \$0.00 Net Amount \$776.00 \$1,092.00 \$2,679.00 \$0.00	\$1,868.00 \$0.00 \$0.00 Net Amount \$776.00 \$1,092.00 \$2,679.00 \$0.00 \$0.00	\$1,868.00 \$0.00 \$0.00 \$1,868.00 Net Amount Description \$776.00 Test Client 1 \$1,092.00 \$0.00 \$2,679.00

HCV Owner portal NHHFA.org



Inspections

- If there is a failed inspection
 - Owner can certify it is completed in the portal
 - Request an extension

Decison: Fail 30 Day

Our inspection findings are listed below. Items marked as Fail need to repaired or corrected, the responsible party for each item is listed below. Items marked as 24 hour fails are considered life threatneing fails and must be corrected within 24 hours of the inspection. Items marked as 30 days need to be repaired no later than 30 days from date of the inspection. Items marked as pass with comment are things that we would like to bring to your attention. It is suggested that they be repaired but it is not a requirement for the unit to meet Housing Quality Standards.

When a repair has been completed, enter the completed date using the date picker and click submit. When finished please use the "Go Back" button, not your web browser's back function.

Descri	tion Decision	Comment	Responsible Party	Date Completed	
Bathroom	Tub Fail 30 Day	Dripping faucet, repair or replace	Owner	MM/DD/YYYY	Submit

Fail items that are not repaired by the specific time frames will result in abatment of your Housing Assistance Payment (HAP). Once HAP payments have been abated the money cannot be recouped by the owner from the housing authority or the tenant. If fail items are not repaired 30 days after HAP abatement your HAP contract will be terminated.

Extension requests should only be submitted when the deficiencies and circumstances are beyond your control to prevent proper corrective action.

Extension Request Form

Go Back

HCV Owner portal



Inspections

- My inspections
 - All inspections completed for a property in the last year
 - All inspections done in the last 5 years-Selection criteria available

Inspection	Time	Tenant Name	Street	Town	Туре	Status	Fail	Extended	HAP Stopped	
11/05/2020	08:00	Test Client 1	1 ABC St	DERRY	ReInsp	Scheduled	-	-	-	
10/06/2020	10:30	Test Client 2	2 ABC St	DERRY	ReInsp	Fail 30 Day	10/06/2020	-	-	Details
10/06/2020	09:30	Test Client 3	3 ABC St	DERRY	ReInsp	Pass	-	-	-	
10/06/2020	12:00	Test Client 4	4 ABC St	DERRY	ReInsp	Pass with Comment	-	-	-	Details
10/06/2020	10:30	Test Client 5	5 ABC St	DERRY	ReInsp	Fail 30 Day	10/06/2020	-	-	Details

HCV Owner portal

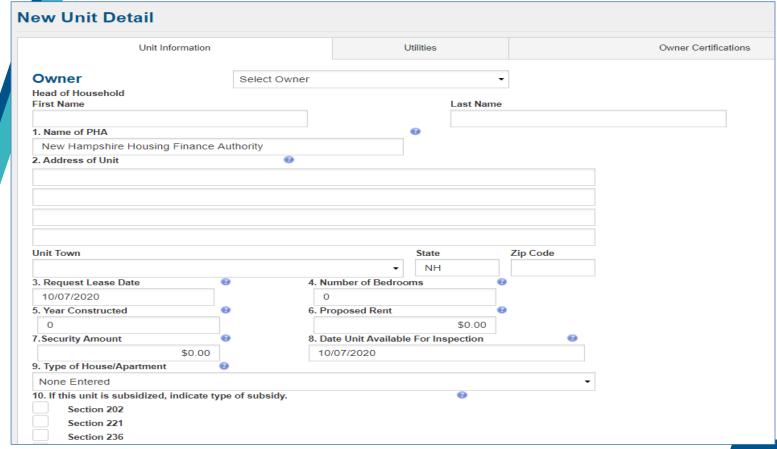


Last Name	First Name	Street	Town	HAP Amount	Tenant Rent	Contract Rent	
Client	Test 1	123 ABC St	MANCHESTER	\$541.00	\$494.00	\$1.035.00	^
Family Member Test Client : Other Adult		Age 68 40	Unit Information Building Type Bedrooms Year Built Annual Re-Exam	Low-Rise 2 2005 4/01/2021	Rental Assistance Manag Gisele Moqui 603-310-9389 603-310-9389 gmoquin@nhhfa.d	in	
Utilities Heating Cooking Water Heating Other Electric Water Sewer Trash Collection Air Conditioning Refrigerator Range/Microwave		Fuel Type Natural Gas Electric Natural Gas	Owner	ed By	Paid By Tenant Tenant Tenant Tenant Owner Owner Owner Tenant Owner Owner		
Test Client	2	456 ABC St	MANCHESTER	\$1.025.00	\$0.00	\$1.025.00	~
Test Client	3	789 ABC St	MANCHESTER	\$458.00	\$482.00	\$940.00	~

HCV Owner portal NHHFA.org



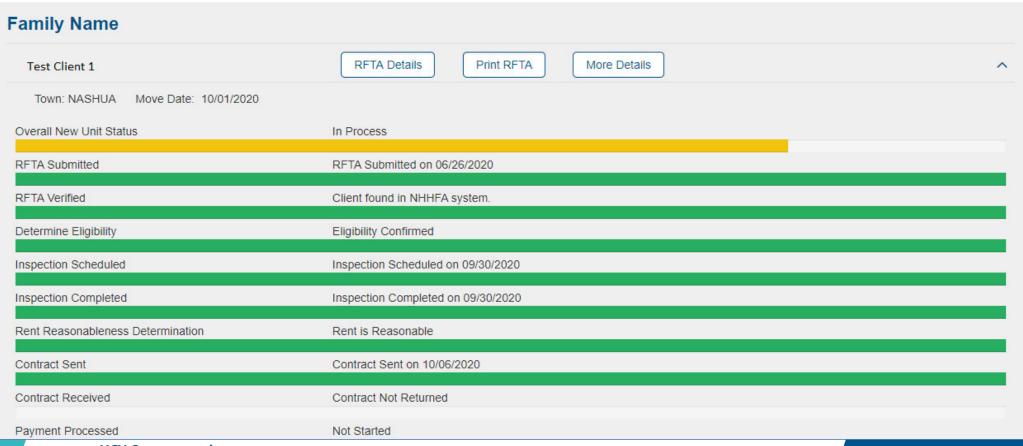
RFTA



HCV Owner portal NHHFA.org



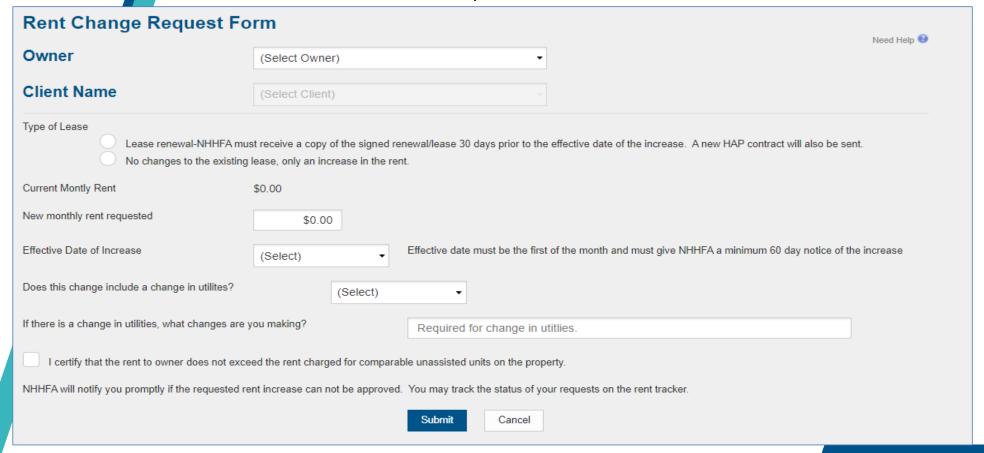
RFTA-Tracker



HCV Owner portal



Rent Increase Request



HCV Owner portal NHHFA.org



Rent Increase Tracker

Tenant Name	Unit Address	Original Rent	New Rent	Effective Date	Status		
Test Client 1	DERRY, NH 03038	\$1,211.00	\$1,235.00	11/01/2020	Completed	Details	Create Letter
Test Client 2	DERRY, NH 03038	\$1,076.00	\$1,097.00	12/01/2020	In Process	Details	Create Letter

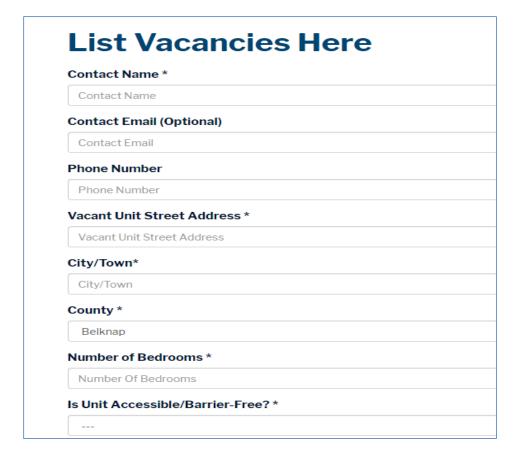
NHHFA.org

HCV Owner portal



Submit Vacant Unit Requests

Direct link to our home page where they can submit vacant units



HCV Owner portal



Messages

- Notifications are sent via the portal
- Email alerts for new messages
- Notifications include
 - Change in HAP
 - Inspection Results
 - Monthly housing assistance payment

HCV Owner portal

NHHFA.org



Gail Quinlan

Director, Program Operations Assisted Housing

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32 Constitution Drive, Bedford, NH 03110

603.472.8623

NHHFA.org









STRATEGY: INSPECTIONS TECHNOLOGY

Utilizing technology to improve the inspections process.

Who: All PHAs regardless of size and/or location.

Cost: \$ \$\$ \$\$\$

Implementation Considerations: • LOW • MEDIUM • DIFFICULT

- Can help landlords and PHAs to schedule and track inspections
- Provides inspections results quickly
- Variations addressed target:
 - Minimizing re-inspections
 - Providing landlords with quick results
 - Scheduling

Minimizing the Number of Re-Inspections

- Administrative Flexibility: PIH 2013-17
 - Provides PHAs with the ability to use photographs to verify corrected deficiencies
 - Note: currently waived, but typically some re-inspections are required
 - Procedural and technological considerations
 - Document in Admin Plan
 - Create process on submitting photos, verifying proof, and storing images or photo files
 - Requires storage
 - Security concerns

For other administrative flexibilities, see <u>Administrative Flexibilities to Enhance Landlord Satisfaction</u> in the Guidebook: https://www.hud.gov/program offices/public indian housing/programs/hcv/landlord/guideb

<u>ook</u>



Remote Video Inspections

- PIH Notice 2020-13 (HA), REV-1
- Allows PHAs to conduct remote video inspections (RVI) to meet the inspections requirements for the program.
- An RVI is a method of conducting a housing inspection using video or digital picture technology, performed by a person other than the PHA or HQS inspector.
- It is anticipated that HUD will allow this process to become permanent.

Provide Quick Results to Landlords

- Inspection conducted on devices such as mobile phones
- Reports posted to portal or sent through email sometimes near real time
- Considerations include software, devices, wireless connections, cameras, service such as data phone plan or hot spots

Scheduling

- Software or manual grouping by ZIP Code or building
- Appointment schedule windows (software)
- Appointment texts
- Artificial intelligence software
 - Can create route and update in real time based on traffic
- Considerations include software, calendar applications, costs, collection of landlord contact information



Cuyahoga Metropolitan Housing Authority (CMHA)

Jeffrey Wade, Chief of Staff/Special Counsel to the Chief Executive Officer

Claire Russ, Director of Research & Program Analysis

Chanel Starks, Deputy Director, Inspections

Profile:

- Cuyahoga county including Cleveland, OH
- •15,419 HCV
- Landlord Portal, Text Messaging Pros and Cons, Technology today



HCVP inspections & leveraging tech

BALANCING CUSTOMER SERVICE, COMPLIANCE AND CONSISTENCY



CMHA Landlord portal

Developed in house by our IT department in 2009

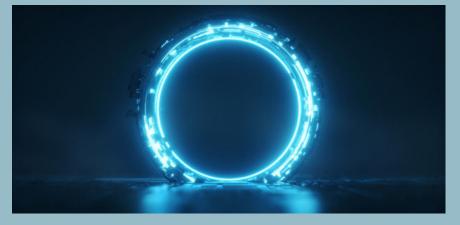
Our software vendor demo'ed a new portal they were developing

- But their portal (at the time) was less functional than what our HCVP department envisioned
- So, we built our own

Our in-house landlord portal sits on top of our system of record

Communicates info OUTBOUND from our software to display to landlords who register for portal accounts

- Extracts data from CMHA software at regular intervals
- Facilitates inbound communication via email
- Can receive uploaded files



What can the portal do today?

Link to CMHA affordability calculator (for future units/contracts)

- This tool considers utilities, which party pays them, and payment standards for landlords to gauge whether the ask is supportable by current payment standards
- Will also pull in income information for active certified eligible applicants and current participants if the person is logged in

Organize current portfolio

- Listing of unit(s)
- With HAP portions & effective dates of HAP contracts

Link to forms

- Direct deposit form
- Rent adjustment form
- Change request form update address/phone/other info
- 1099s

Message center

Upload documents via inquiries

Print HAP contracts

View HAP payment information & HAP payment calendar

Access reports -

- Occupied units w/basic participant information
- Rent history (rent changes for portfolio over last three years)

Maintain inspections information

- Extension request rescheduling/extension of upcoming inspection
- Pass/fail updates
- Photos We maintain photos of fails only
- 3rd party inspection vendor copies inspection photographs to an FTP server that CMHA has access to for retrieving the photographs
- Once retrieved from the FTP server, the photos are copies to a shared drive and to the
 web server which is where they are processed and linked to the appropriate inspection
 for displaying in the portal
- Photographs taken using the HQS Touch app (on a handheld, software integrated device) are:
 - Uploaded to Amazon Web Services (AWS)
 - The AWS location is sored within our software
 - Which is then used for displaying the photograph in the landlord portal



Rent Affordability Calculator

HCVP Utility Allowance Chart ■

Complete the form below to use the Rent Affordability Calculator:

Annual Gross Income 🗓	
Adjusted Income	
Owner's Requested Rent	
Indicate City	Select Below ▼
Indicate Voucher Size - RFTA bottom of Page 1	Select Below
Indicate Unit's Bedroom Size	Select Below
Will the applicant pay for Electricity?	Select Below ▼
Will the applicant pay for Gas or Electric energy source costs? (heating, cooking, water heating)	Select Below ▼
Will the applicant pay for water/sewer?	Select Below ▼
Will the applicant pay for trash collection?	Select Below
Which appliances (if any) will the applicant provide?	☐ Range ☐ Refrigerator
Calculate Start Over	

- The affordability calculator only applies to new contracts.
- It views the landlord's requested rent from an affordability standpoint. HUD regulations stipulate that the rent be both reasonable and affordable. Therefore, even though the calculator shows that the requested rent is affordable, this does not mean that it is necessarily reasonable. Once the rent reasonableness test has been conducted, you could be presented with a final rent offer for less than your original request, because of this.
- Income, family composition, payment standards are subject to change after the completion of the affordability test.
- Unit bedroom size to be confirmed at the inspection.
- This calculator is a guideline for rent costs only. This calculator does not necessarily represent your actual final rent costs.

Additional functionality in V2 upon further consideration

Current version is Version_2 of our portal

After V1, CMHA added a functionality for landlord portal uses to create **groups** and arrange units by site or by managing agent

- This way, property managers/management agents can have portal accounts even if they are not the owner/HAP payee
- The owner governs/designates roles and accessibility for the approved managing agent

Balancing accessibility with storage realities

- In the portal, landlords can access contemporary information
- But it's not designed to store documents perpetually
- 1. Failed insp. items (including photos) are accessible for the past year
 - We may extend this with biennial inspections
- 2. Account statements for the past 2 years
- 3. 1099s for the past 3 years
- 4. Inspection results for the last 4 years



Leveraging the portal to text/email



Outbound communications - texts and emails

- Initial opt in affirmation that occurs via portal registration
- Also features a physical "opt in" check box

At one point, the portal offered text messaging & email notification for upcoming scheduled HQS inspections

- We maintained this functionality internally
- Unfortunately, there was no way to capture replies
- The only way to watch who was unchecking our "opt in" check box was manually stewarding the data

Currently – CMHA blasts informative emails via RAVE (a third party Customer Relationship Management [CRM] type of vendor)

We do not send out day-to-day texts linked to appointments

Why step back from scheduling texts?

CAN-SPAM Act - 2003

- Governs commercial email
- Prohibits advertising or mass messaging without disclosures that "this is a mass message"
- Most of us have this type of language as well as unsubscribe options at the bottom of our email blasts

Telephone Consumer Protection Act (TCPA) - 1991

- Are PHAs are governed?
 - To be covered, you have to receive some benefit from the text, like, Doordash/Uber
 - Initial HQS inspections (that pass) allow the PHA to lease the unit, triggering HAP and increasing
 Admin fees, so the argument could be made that the PHA has some kind of gain from the text message
- TCPA requires you have parameters including:
 - 1. Affirmatively opt in to receive texts
 - 2. Have to have the option to opt out, perpetually (and maintain it)



Other text messaging considerations

State laws governing communication can be tougher than the two Federal laws mentioned above

Just like in procurement, you'll need to follow the stricter law

Good tech will pick up words like "stop," "no," or "unsubscribe," (plus any variations that are misspelled)

- The PHA will want to confirm that there is a monitored delivery box of opt out information
- The PHA will want to maintain an active and readily available opt out list
- The PHA may want to confirm opt in/out statuses and changes in their system of record

Other consideration for texting - replies to *noreply accounts* could be misconstrued as "giving appropriate notice"

- Even if there is no where return texts go you can reply to texts -
 - Text: "Reminder your inspection for 123 Main Street is tomorrow afternoon. This account is not monitored."
 - Text Reply (that goes nowhere): "Mrs. Jones moved out."

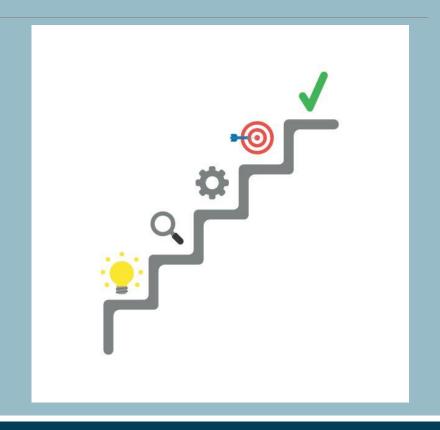
We want to make sure we do the legwork educating users that texting is not an acceptable method to give notice

What's next for text appointment confirmations?

PHA can discuss with their HUD field office rep and request guidance

PHAs can communicate to their field reps that official guidance, such as a PIH Notice, would be helpful because it may establish:

- Safe harbors or standard language (for inclusion in texts/emails), or
- Establish or suggest minimum program requirements
- Indicate that appt. scheduling texts might follow delivery/service notification protocol Such guidance from HUD may help protect PHAs by limiting exposure



Next generation portals

Portals must be mobile friendly

 When we first launched in 2009 – our in house portal was "the best thing HCVP ever did," according to our landlords...

Look around - shop - see what people are doing

• Also consider: what you build alone, you must maintain alone

Portals should be **two way**, pushing information out to customers but also bringing it back to your system

- Should communicate updates back to your software of record & fully integrate
- May require data stewardship role, depending on the volume of transactions

Next generation: Step-by-step RTA tracker (to match with internal processes)

Our new software provider has an option via their resident portal where a PHA can text a client... (and the client can opt out perpetually)

- Have not rolled it out yet on the landlord side...
- Keep up the pressure on our vendors!



Leading with tech in a post-COVID world

Kiosks

- Once considered cold or impersonal, kiosks are making a big come back
- Balancing geography/feasibility/user friendliness
 - · Consider positioning kiosks throughout jurisdiction
 - Places where staff can maintain the hardware and perhaps provide customer service assistance

Conducting business electronically with fully functional e-signatures & fillable forms

- HAP contracts
- RTA submission (via landlord portal) landlord will still need to upload lease agreement
- Recertifications

Virtual meetings

- Appointment requests
- Virtual group & briefing sessions how to manage registration, track participation and attendance
- Virtual meetings with specialists
 - You may have to invest in web cams and/or laptops

Tracking process flow, team engagement and monitoring production goals remotely

Other HUD Efforts for HCV Landlords

- Resources Webpage
 - NEW! COVID FAQs
 - NEW! Steps to Become an HCV Landlord
 - NEW! Myth-busting and Benefits for HCV Landlords
- Symposiums will be going virtual. Stay tuned!
- HUD's landlord mailing list
 - Sign up now, regular updates coming soon
 - landlordtaskforce@hud.gov

Questions?

Conclusion

- Join us in November for the next Guidebook chapter webinar
- HUD HCV Landlord Resources
 - https://www.hud.gov/program_offices/public_indian_housing/p rograms/hcv/landlord
- Housing Choice Voucher (HCV) Landlord Strategies Guidebook for Public Housing Agencies