

FR-6191-N-01, Section 8 Housing Choice Vouchers: Implementation of the Housing Choice Voucher Mobility Demonstration

Questions and Answers | Updated January 14, 2020

HUD has drafted responses to questions received on the HCV Mobility Demonstration. Please note that HUD is updating all of the Q&As in one file. The numbering within this document may change as new questions are answered. HUD indicates when a new question is answered by adding **(NEW)** next to the question.

Mobility-Related Services

1. When a family ends its participation in mobility services, will the family still be included in the evaluation?

Yes.

2. If PHAs propose alternative services, who makes the final determination on the service model -- the evaluator, the PHA, the TA provider, or HUD?

The final determination will be a collaborative effort. Please see Section III. Mobility-Related Services, Memorandum of Understanding and Performance Standards Requirements.

3. Is there a pre-defined list of administrative policies that a PHA would have to accept to participate in the demonstration?

Please see Section III. Mobility-Related Services for a discussion on administrative policies. Please also see Section VII. Application Format, Section L.

4. What is the thinking behind starting the SMRS at year 3 instead of at the beginning of the program?

This is to allow for all sites to implement the comprehensive mobility related services and begin to understand what is working before paring down to a more limited set of mobility services.

5. If families enroll in Year Six will they only receive services for one year?

PHAs can continue to provide mobility-related services to families if they have funding available.

6. HUD's notice requires participating PHAs to target new Mobility Demonstration Vouchers as well as a portion of turnover vouchers to families with "young" children living in high-poverty neighborhoods. Under HUD's model enrollment plan, however, only one out of 13 families enrolled in the Demo would be newly admitted families subject to this selection preference. Does HUD encourage or suggest that PHAs also prioritize for participation in the Demonstration similar existing voucher families (with young children in high poverty neighborhoods), through strategies such as focused education about the Demo or other means? Or will HUD just be leaving it up to PHAs to take such steps if they wish to do so?

Existing voucher holders likely will be recruited at reexamination or at any such time they indicate interest in moving. There will be no requirements for existing voucher holders to be currently residing in a high-poverty neighborhood to participate in the demonstration.

7. Do the selective mobility related services that will be implemented in later years of the Demo need to be a subset of the comprehensive mobility related services, or can they be a separate set of services?

The selected mobility-related services will be a subset of the comprehensive mobility-related services.

8. Can PHAs market participation in the Demo to families in PBV units in non-opportunity areas (RAD or other properties) who are seeking to move with the next available voucher?

PHAs can recruit and enroll existing voucher holders from across their entire HCV program. After selection, HUD will work with PHAs to establish a recruitment and enrollment plan.

9. Under the PBV program, a family may not move from their unit until after a year of occupancy and only if the PHA has tenant-based vouchers (or other comparable tenant-based assistance) available. How would the PHA balance this limitation with a family's desire to move to an opportunity area as a result of the mobility-related services?

PHAs likely will be recruiting and enrolling existing voucher holders, including PBV families, at reexamination and at any time the family indicates interest in moving. All families that participate in the demonstration likely will have constraints around their ability to move when their lease term expires.

10. Why is HUD requiring PHAs to indicate in their applications what subset of the comprehensive services they anticipate they would want to test in the second phase

focused on a potentially more cost-effective package, rather than waiting for the initial results?

HUD believes PHAs may have preferences or ideas regarding selected mobility-related services. As part of the application, HUD wants to understand what PHAs are most interested in implementing.

11. When is Year 1 of implementation expected to begin?

HUD, the research evaluator, and the TA provider will begin to work with PHAs immediately after selection, which will be the start of Year 1. The first year is intended to be largely a planning and pilot year. It is likely that the PHA will not start providing mobility-related services until the fourth quarter of Year 1.

MDVs and Turnover Vouchers

12. Do all PHAs need to have turnover vouchers available if the group of PHAs is seeking demonstration vouchers?

PHAs that are applying together as a joint applicant must together meet the turnover voucher requirements. Each PHA does not necessarily need to have turnover vouchers available.

13. Is there a possibility for adding a Public Housing family as a New Admission for an MDV or does the family have to be in the Section 8 program-only?

PHAs will select from their existing waiting list. It is possible that public housing families are on the existing waiting list.

14. Do the turnover vouchers have to be in the control group?

Yes.

15. When do you anticipate that a PHA would need to have turnover vouchers available for use in order to access the demonstration vouchers?

Please see Table 3.

16. Is it possible for a PHA to just focus on existing families since there are a limited number of MDVs?

No. PHAs are required to recruit and enroll new admissions and existing voucher holders.

17. Is the family eligible for the preference if their youngest child will be over 13 at the time of the voucher issuance?

To receive the preference, the family must have at least one child aged 13 and under living in a census tract with a family poverty rate of 30 percent or higher at the time the preference is verified by the PHA and in accordance with the PHA's Administrative Plan.

18. Can you provide more details about potential waiting list selection plans?

PHAs applying for the demonstration must agree to adopt a waiting list preference for families with children with at least one child aged 13 and under living in a census tract with a family poverty rate of 30 percent or higher.

However, HUD recognizes that PHA waiting lists can be administered differently from PHA to PHA. Additionally, many PHAs will be applying together and likely will have different preferences among themselves. HUD indicated in the notice that they will work with individual PHAs after they are selected to draft waiting list selection policies and a proposed selection schedule for the course of the demonstration.

HUD intentionally was not overly proscriptive about how exactly the waiting list selection process would work at individual PHAs during the application phase of the notice. HUD recognizes that this demonstration's preference will be one among many local priorities.

In the notice, HUD has provided some references to PIH Notice 2013-15 about how limited preferences may work at PHAs and encourage PHAs to read that notice.

19. Can existing special purpose voucher holders participate in the demonstration provided they are families with children?

Yes.

20. Can port-ins participate in the demonstration provided they are families with children?

Yes.

21. If a PHA wants serve the minimum of 1,950 families with children over the 6-year period, how many vouchers should they request?

HUD is unable to provide guidance on how many vouchers a PHA should request as part of their application.

22. Will HUD provide additional HAP funding for the potential increase in the per unit cost due to increased payment standards in opportunity areas?

PHAs provide their mobility demonstration voucher estimated per unit cost (PUC) for on the Application for Federal Assistance Form SF-424. This PUC will be based on the PHA's current 3 bedroom per unit cost.

However, HUD recognizes that over time there is the potential for a PHA's per unit cost to increase due to increased payment standards in opportunity areas. HUD addresses PUC increases through its annual renewal formula. There is no specific new HAP funding being made available under this demonstration except for the award of new MDVs.

23. Will HUD please provide an example of a voucher and funding amount for serving the minimum number of families?

HUD is unable to provide an example of the voucher and funding amount for serving the minimum number of families. The minimum number of participants is inclusive of existing voucher holders and two types of new admissions (MDVs and turnover vouchers).

Definitions

24. What is the meaning of opportunity areas in this demonstration?

Please see Section VII. Application Format, Part G: Soundness of Approach, Subpart 5: Proposed Methodology and Opportunity Areas.

25. What geography level will the opportunity areas be at? By census tract? By zipcode? either or? Can PHAs and partners define this?

Please see Section VII. Application Format, Part G: Soundness of Approach, Subpart 5: Proposed Methodology and Opportunity Areas.

26. How is a High-Performing FSS Program defined?

Please see Section VII. Application Format, Category B, Consortia with Small PHA. HUD will consider any agency that has an FSS program to have a high-performing FSS program.

27. Is there a sample Regional Housing Mobility Plan?

No.

28. How does HUD define "Poor, Low-Opportunity Neighborhoods?"

Please see Section VII. Application Format, Part K which says, "for the purposes of this demonstration, census tracts that have (i) greater than 25 percent poverty or (ii) designated as a qualified census tract under the LIHTC program are considered 'poor, low-poverty neighborhoods.'"

29. If an existing voucher holder does not live in a "Poor, Low-Opportunity Neighborhood," could they still participate in the randomized control trial?

Yes. PHAs will recruit existing voucher holders at reexamination. There is no requirement for an existing voucher holder to live in a poor-low opportunity neighborhood. The "poor low-opportunity neighborhood" designation is only used in reference to PHA eligibility under Categories A and D.

30. Our office does not currently utilize the HUD exception payment standard for the HUD exception areas. Will we be able to utilize the HUD exception payment standards and or the SAFMR to serve more families if we are approved for mobility?

PHAs can choose to adopt SAFMRs currently under program regulations.

31. In Rating Factor 3, if you collaborate with another PHA with a lower Opportunity Score, will the scores be averaged?

Please see Section VIII. Rating Factor 3 for the calculation.

32. What is the role of localities in identifying high-opportunity areas? How much flexibility will they have given the 20% poverty threshold?

Please see Section VII. Application Format, Part G: Soundness of Approach, Subpart 5: Proposed Methodology and Opportunity Areas.

33. How did HUD determine how many families each PHA has living in "poor, low-opportunity areas?"

HUD's Office of Policy Development and Research analyzed the December 2019 PIC data extract and determined how many families with children each PHA has living census tracts that have (i) greater than 25 percent poverty or (ii) designated as a qualified census tract under the LIHTC program.

34. Can the payment standards exceed 110% of FMR?

PHAs participating in the demonstration may request programmatic regulatory waivers as part of their application. Please see Section VII. Application format for more

information on regulatory waiver requests. PHA requests for regulatory waivers for exception payment standards will receive strong consideration by HUD.

35. Will higher payment standards be expected to persist beyond the demonstration?

No. PHAs must adhere to program regulations and follow their administrative plan policies regarding changes to payment standards for participants.

36. Are the tract level family poverty rates pulled from the latest 2014-2018 ACS estimates? Or from another 5-year estimate range?

HUD used the 2013-2017 5-year ACS estimates.

37. If we have already defined our own opportunity tracts in ArcGIS Pro (which meet the minimum requirement of less than 20% family poverty rate), do we have to use this manual GIS tool from HUD?

Yes. PHAs are welcome to submit additional maps as part of their application but please be mindful of page limit requirements.

38. Must the agencies applying under Categories B and C already be operating as a consortium?

No.

39. Does the "adequate number" calculation assume that PHAs will be adopting a SAFMR for their payment standards in those areas?

No. The adequate number of moderately priced rental units in high opportunity areas is part of the eligibility criteria for Category A and D PHAs. PHAs can propose in their applications their plans for adopting adequate payment standards in opportunity areas.

40. It appears HUD uses three different poverty rate measurements throughout the notice. Why?

The Notice uses different poverty thresholds for separate and distinct purposes. These have been selected based on the best evidence, and importantly, balanced for maximum flexibility for PHAs to apply for the demonstration more readily.

First, a poverty rate of 25 percent is used as only one criterion in a two-part definition for the statutory term, "poor, low opportunity area." It is important to note that once PHAs have qualified and are accepted to the Demonstration, they no longer have to use this threshold as it is not used by PHAs for ongoing operations. This definition is for eligibility purposes only.

This threshold was based on similar requirements used in the Small Area FMR (SAFMR) designations. Using this threshold also allows for a simple qualifying criterion for mandatory SAFMR PHAs to automatically qualify for this eligibility criteria. It is also “harmonized” for those PHAs that have voluntarily adopted SAFMRs.

Second, the threshold of 20 percent poverty is only used as an upper boundary. It is the maximum level above which a local census tract area may not be designated as an “opportunity area.” Stated in the reverse, “opportunity areas” may only be selected among census tracts that have less than 20 percent poverty. In some other contexts, for instance in research literature, assessing opportunity using a lower threshold of 10 percent is sometimes used. However, HUD was concerned that selecting 10 percent threshold might be unnecessarily restrictive and may leave out potentially beneficial areas that PHAs will be better situated to identify, working together with HUD’s research evaluation contractor. Thus, using 20 percent provides PHAs with more flexibility in recognizing local market conditions.

Third, the poverty rate of 30 percent is used for the required waiting list preference for new admissions to target families with young children living in high poverty areas for priority selection into the demonstration. It is sometimes common to see a higher level of 40 percent poverty used, for instance in research literature analyzing “concentrated poverty.” If HUD had used the higher 40 percent poverty rate, there would be fewer families eligible for this preference. Using the still significant 30 percent threshold broadens the pool of potential applicant families that might benefit from the demonstration. Note that “concentrated poverty” and “opportunity areas” are different concepts and do not necessarily require use of the same bright-line cutoff point where one ends and the other starts.

41. Under Category D, for a PHA to independently apply, how is an adequate number of moderately priced units in high opportunity areas defined?

HUD defines an adequate number of moderately priced rental units in high-opportunity neighborhoods as a selected service area where at least 20 percent of the standard-quality-rental-stock within that service area must be renting at less than 110 percent of SAFMR in ZCTAs where the SAFMR is more than 110 percent of the Metropolitan Area FMR. The definition is the same for Category A and D applicants.

42. Is it possible to download/access the SHP files or layers for HUD's mapping tools?

Yes. Please see the following links to access that data:

Opportunity Census Tracts

https://services.arcgis.com/VTyQ9soqVukalltT/ArcGIS/rest/services/Opportunity_Neighborhoods/FeatureServer/0

Approximate Service Areas

https://services.arcgis.com/VTyQ9soqVukalltT/ArcGIS/rest/services/Proposed_Housing_Authority_Service_Areas/FeatureServer/0

ZCTAs

https://services.arcgis.com/VTyQ9soqVukalltT/ArcGIS/rest/services/ZCTA_Market_Analysis/FeatureServer/0

43. Will the high enough payment standards participating PHAs will be required to adopt apply only to the SMRS, CMRS and control group or will they apply to everyone on our current HCV Program?

Although they may wish to consider doing so, PHAs are not required to adopt the same payment standards adopted for the mobility demonstration to also apply to the remainder of their overall HCV program. HUD will work with selected PHAs, the evaluator, and the TA provider to develop final policies on the payment standards for opportunity areas after selection. As stated, PHAs may also consider adoption of such payment standards or other policies that are available under existing HCV program authority to apply to the remainder of their HCV program, which may simplify the PHAs own administrative operations.

If PHAs want to have different payment standards for demonstration participants and their regular program, they must request a regulatory waiver of 24 CFR 982.503(a)(3) and provide good cause as part of their application.

44. While our PHA understands the waiting list preference for new admissions requires families with at least one child aged 13 and under [and living in a high poverty census tract], is that the same definition for existing voucher holders with children? (NEW)

No. There is no waiting list preference for existing voucher holders with children. However, existing voucher holder participants must be families with children, which are defined as families with at least one child aged 17 and under.

45. Given that opportunity areas likely will be defined at the census tract level and SAFMR are at the zip code level, there may be a spatial mismatch. For examples, there are a number of instances where a census tract categorized as an area of opportunity is comprised of more than one zip code. As such, a landlord with housing in the same neighborhood may get drastically different payment standards depending on which zip code it falls under in a given census tract. It would be helpful if payment standards and areas of opportunity are the same unit of geography. Our PHA has a few questions related to this issue:

Has HUD considered calculating SAFMRs at the census tract level for PHAs to use for the HUD demo? Can PHAs calculate payment standards for census tracts based on local data or other available public data? In other words, can PHAs use data other than SAFMRs or FMR to calculate payment standards?

At this time, HUD has not calculated the SAFMR at the census tract level. Applicants for the HCV Mobility Demonstration are required to adopt high enough payment standards for families to access areas of opportunity. The notice also says, "If the PHA(s) does not currently use Small Area Fair Market Rent (SAFMR), they indicate whether the PHA will opt-in to the use of SAFMRs, or if not, their alternative method of ensuring adequate payment standards in opportunity areas." As such, PHAs may propose an alternative method for payment standards in their applications.

After selection, HUD will work with PHAs to finalize payment standards in opportunity areas. HUD will consider the alternative method proposed by the applicants and will develop the final payment standards in cooperation with the PHA and the research evaluator.

Funding

46. Can mobility funds be used to subsidize rent in a way that is different than a traditional voucher, for example time limited?

Please see Section IV. Award Description for information on eligible uses of funds.

47. Are PHAs required to use HUD's estimated costs of mobility services per treatment family in developing their funding request?

Yes.

48. How will the administration of the vouchers and administrative funds work amongst a consortium of PHAs?

Please see Section VII. Application Format, Part K for more information on consortia.

49. What percentage of the award will be allocated for vouchers and what percent of the award will be allocated for mobility related services?

A total of \$50 million is available for the demonstration. Up to \$10 million will be available for Mobility Demonstration Vouchers. The remainder will be allocated for mobility-related services.

50. Is the administrative fee higher for mobility vouchers?

No.

51. Although the MDVs cannot be used for PBV, can applicants include PBV pilot activities (using other vouchers) in the planning process?

PHAs can only use mobility-related service funding for the PBV activities described in the notice.

52. For new admissions, what data was used to estimate the number of MDVs to be made available with the appropriated funds? If those projections are incorrect, where will the required vouchers come from?

HUD used a per unit cost (PUC) estimate based on data from the Family Unification Program, which we believe may be similar in cost to the demonstration. However, we recognize that the PUC will vary depending on which PHAs are selected and that we must estimate potential increased HAP costs related to more moves to opportunity areas.

HUD has estimated that about 1,000 new vouchers will be made available. If the selected PHA per unit costs are higher than our estimates, HUD would award fewer vouchers to PHAs.

53. How has HUD estimated the \$4,000 and \$2,000 per enrollee cost for the comprehensive mobility-related services and select mobility-related services, respectively?

HUD used the best available cost data on mobility-related services. [The Creating Moves to Opportunity](#) evaluation, page 61, Appendix Table 1 provides a summary of all available cost information and estimates on mobility-related services. HUD looked at those studies, and the components of services offered, and developed these estimates. Please note that HUD's estimates for mobility-related services includes the following: all mobility-related services to be offered (including family financial assistance), administrative overhead for overseeing the program and research evaluation, and other regular PHA staff time necessary for participating in the demonstration.

However, one of the key pieces of information HUD wants to learn in this evaluation is what are the actual costs of mobility related services and we intend to collect adequate information to be able to answer that question more definitively through this demonstration, rather than relying on other studies.

HUD encourages PHAs to review Section X Application Review Process- Negotiation which says, "after HUD has made selections, HUD may negotiate specific terms of the funding agreement and budget with selected applicants."

54. Can MTW agencies use MTW funds to supplement the mobility-related services funding?

To effectively implement an RCT, all PHAs sites will be required to implement substantially the same set of services. HUD will be providing enough mobility-related service funding to each selected PHA site to implement those agreed upon services. At this time, HUD cannot think of a scenario where additional MTW funds would be needed to supplement the budget. However, HUD would engage in discussions with selected PHAs to better understand why PHAs think additional funds would be needed, and therefore is not absolutely foreclosing the possibility of using MTW funds to supplement mobility-related services funding.

55. Is there a specific form that will be used for budget implications related to the mobility demonstration?

To develop their funding requests, PHAs should follow the instructions in Section VII, Application Format, Part F Need/Extent of Problem, and the Application for Federal Assistance Form SF-424 and SF-424B.

Eligibility

56. Do you have specific guidance on how formal a consortium needs to be in legal terms at the time of application? I am thinking of a consortium that does not exist now and would be formed for the purpose of this project.

Yes. Please see Section VII. Application Format, Part K.

57. If a PHA has only 350 families with children on its program and the PHA cannot meet the 1,950 required over six years so should not apply probably?

The PHA may want to consider partnering with nearby PHAs and applying under Category A: PHA Partnerships, Category B: Consortia with High-Performing FSS Program, or Category C, Consortia with Small PHA, to meet the minimum enrollment requirements.

58. To participate in this program, does the PHA have to already administer a section 8 voucher program?

PHAs must meet the minimum enrollment requirements described in Tables 2 and 3. It is unlikely that a PHA that does not administer HCVs currently would be able to meet that enrollment requirement.

59. We are currently working with the Shortfall Prevention Team. Are we still eligible for this?

Yes.

60. If our program area has no census tract with poverty that is above 20 percent, then all our areas are opportunity areas and we would not be eligible to apply, correct?

The PHA may want to consider partnering with nearby PHAs and applying under Category A: PHA Partnerships, Category B: Consortia with High-Performing FSS program or Category C: Consortia with Small PHA, to have an adequate number of opportunity areas.

61. While only PHA's can apply, can PHA's designate a separate entity, i.e. a nonprofit or consultant, to administer the program?

Yes. The PHA should follow its procurement policies to select an administrator.

62. Does the lead applicant have to be a PHA?

Yes.

63. There are other PHAs that administer vouchers in a region. Will more than one PHA in the same region be able to apply?

Yes.

64. If a PHA has already defined its opportunity areas using their version of GIS (which meet the requirement of less than 20% poverty) does the PHA have to use the HUD GIS tool to capture the image and pull the CSV file?

Yes.

65. If a PHA is eligible under the first element of Category A, and eligible as a single jurisdiction under the second element of Category A, but wants to partner, do all of the jurisdictions need to qualify under the second element?

PHAs applying together must meet the eligibility requirements of Category A together.

66. If a partnering PHA is in shortfall, what steps can the lead PHA take to ensure a successful program (e.g., can the lead PHA donate additional turnover vouchers to the demonstration; absorb vouchers from the partner PHA; or take steps to share costs of exception payment standards)? If the lead PHA is in good standing and if it takes such

steps, does the fact that the partner PHA is in shortfall necessarily exclude them from participating?

PHAs in shortfall may participate in the demonstration. PHAs may want to consider explaining in their applications whether or not they anticipate that being in a shortfall status would impact their participation in the demonstration.

67. Are Moving To Work PHAs eligible to participate?

Yes.

68. Can a non-PHA play a large role in service provision, evaluation, and regional coordination among PHAs and other partners? If such a role is allowed outside of the PHAs, are there guidelines as to how much of the funding can go to such an entity?

Yes, PHAs may work with non-PHAs to implement the demonstration. However, the evaluation will be completed by HUD's research evaluator. There are no guidelines of how much funding can go to a non-PHA entity.

69. Will PHAs that apply as a "partnership" under Category A be able to have a single administrative unit to administer the housing vouchers of families in the treatment group[s], as well as the mobility-related services such families receive. This may prevent portability billing challenges and allow other efficiencies in responding to the needs of families and landlords.

PHAs that apply under Category A PHA Partnerships will describe their proposed roles and responsibilities in Section VII. Application Format.

70. If a PHA is unable to enroll the full 1,950 families, will the PHA receive less funding?

Applicants must be able to enroll 1,950 families to participate in the demonstration.

71. Can a non-MTW agency partner with an MTW agency?

Non-MTA agencies may partner with MTW agencies as part of Categories A and D applications. MTW Agencies may not participate in a single HCV funding contract consortium under Categories B or C. MTW agencies may participate as a partial consortium under Categories B and C.

72. In the application process, are there additional points awarded for regional collaboration?

Rating Factor 1 provides up to five points based on the jurisdictional and regional reach of the mobility program.

73. Can PHAs contract with third-party organizations and partners to provide certain mobility counseling services? If so, should we include a list of these partners in our application?

Yes, PHAs can work with partners to provide mobility-related services. PHAs can provide information on partnerships with service providers, and other organizations in Form HUD 52515, Part G, Subpart 2, Community Partnerships, and Part J, Memorandum of Understanding.

74. For newer and expanding mobility programs, where new service partners might be needed to cover new geographies or to provide additional support and expertise, is it ok with HUD if applicants assemble the team without any formal procurement process?

HUD's review of an application will not weigh whether a formal procurement process has been undertaken at the time of submission. PHAs can provide information on partnerships with service providers, and other community partnerships, in Form HUD 52515, Part G, Subpart 2, Community Partnerships, and Part J, Memorandum of Understanding. PHAs may submit memoranda of understanding, letters of commitment on agency letterhead, agreements, board resolutions, or contracts related to the demonstration in these sections.

75. Regarding Part D, if our state law allows participating housing authorities to administer vouchers statewide, can the geographic area of our demonstration include jurisdictions where the local PHA is not formally part of our Category A partnership?

Yes.

76. If a statewide or regional PHA is considering an application under Category A, partnering with another PHA for one county, but has other counties that they want target some vouchers to as well, where there would be no partnering PHA, would the PHAs still submit an application under Category A and explain that in the application? The partnering PHA will be requesting MDVs.

Yes. The PHA would be eligible to apply under Category A, assuming all other eligibility criteria are met.

Research

77. How would a family be treated if at some point after enrollment the child(ren) leave(s) the household?

The family would continue to be part of the demonstration.

78. Does HUD have a standard informed consent form?

HUD will provide a standard informed consent form for PHAs to use for this demonstration. However, that form is not yet developed.

79. For current participants, does a family have to be a family that is moving in order to participate?

No. Please see Section II. Research Evaluation which says, “recruitment and enrollment of existing voucher holders likely will occur at recertification or when a family indicates interest in moving.”

80. Over what period of time must enrollment occur?

Please see Table 3.

81. If a family decides to no longer participate in the program does the PHA need to find a replacement for the family?

The PHA does not need to find a replacement for the family if the family has already been enrolled in the demonstration.

82. If the PHA is participating as a joint agency is the 1,950 minimum families enrolled for each agency or combined?

Combined.

83. Are PHAs expected to move and lease a specific number of families within a certain time frame?

Please see Table 3. PHAs are not required to “move” or “lease” any specific number of families in opportunity areas. PHAs are required to recruit and enroll a specific number of families within a certain time frame.

84. If families do not agree to participate and are placed back on the waiting list as a result, does this bias the sample/steer enrollment?

Participation in the demonstration is voluntary in order to preserve individual autonomy and choice. Every family, whether on the waiting list or an existing voucher holder, has the choice of whether to participate in the demonstration or not. This is a limitation of

the study. People who choose to participate may be different than those who do not choose to participate, which may impact the generalizability of the study findings.

That is, people who participate may be somewhat different than those who declined based on “observable” characteristics (e.g., gender) or “unobservable” characteristics (e.g., interest in moving). The study findings will need to be interpreted in light of this.

However, among people who choose to participate, randomization is the optimal way to address differences that may exist between study groups. Randomization effectively balances the study groups on observable and unobservable differences that may exist thereby adding confidence that any difference in moving to opportunity neighborhoods are due to the intervention itself rather than a family’s self-efficacy or other factors. In terms of recruitment over time, analyses are able to ‘adjust’ for this factor and the overlapping recruitment (between CMRS and SMRS in some years) will ensure that potential differences between the two treatment groups are not purely due to temporal effects.

85. During HUD’s [first webinar](#) on the notice, the presenter said that all new admissions families would receive some mobility services. If I heard that correctly, could you clarify how this would reconcile with random assignment (i.e., the control group)?

After a new admission family provides informed consent, the family will be randomized into a treatment or control group. If the family was randomized into the treatment group, the PHA will give the family an available MDV and the family will be offered mobility-related services. If the family were randomized into the control group, the PHA will give the family an available turnover voucher and the family would not receive mobility services. Families in the control group will receive HCV program business-as-usual services already offered by participating PHAs to all HCV applicants and participants.

86. What are the minimum detectable effects that are anticipated with this minimum enrollment schedule? And will these sample sizes allow for differentiation in understanding outcomes for movers and new admissions separately?

For internal estimates, HUD used a minimum detectable difference of 0.1 (i.e., a 10 percentage point difference between the proportion in the control group and treatment group) who move to an opportunity neighborhood.

The sample sizes should allow for sufficient power to allow for analyses of new admissions and movers separately. In addition, the large sample size should permit analyses of movers within single study sites as well as pooling data across sites. By contrast, we expect that the analyses of new admissions will need to be performed across study sites; there will be insufficient power within study site analyses.

87. Is the enrollment schedule flexible (i.e., fewer CMRS in years 1-3 and more in years 4-6)?

For the purposes of the application process, no. Selected PHAs, HUD, and the research evaluator may make changes to the enrollment schedule collaboratively if necessary.

88. Are PHAs allowed to modify the Enrollment Schedule in Table 3 of the notice, rather than serving the same number of families in the first treatment group each year (such as by beginning enrollment in the first year or otherwise enrolling a larger share of the CMRS group in the first three years) ?

For the purposes of the application process, no. Selected PHAs, HUD, and the research evaluator may make changes to the enrollment schedule collaboratively if necessary.

89. Given the demonstration's required minimum number of participating families, and the need for turnover vouchers to fill those slots, is there a recommended minimum PHA size for participation?

No.

90. Has HUD evaluated the SAFMR program's success? The MDV program has similar goals.

Yes, HUD has evaluated the [Small Area Fair Market Rent program](#). The HCV Mobility Demonstration is evaluating a different set of research questions than the SAFMR study.

91. If an existing voucher holder did not live in a "Poor, Low-Opportunity Neighborhood," could they still participate in the randomized control trial?

Yes.

92. Will HUD set an opportunity measure of a voucher holder's existing neighborhood above which that family could not participate in the program?

No.

93. Could an applicant propose alternate criteria for neighborhoods from which to draw participating voucher holders for this program?

PHAs are required to adopt the waiting list preference exactly as described in the Federal Register notice. There are no requirements to recruit or enroll existing voucher holders from any specific neighborhoods.

94. HUD's notice states that "The initial CMTO results are promising, but more research is needed to understand if these interventions work similarly in other locations and contexts." [85 FR 42890] How will HUD assure that the sites selected to participate

reflect different types of housing markets, patterns of residential segregation, or administrative contexts?

HUD encourages PHAs from all states and regions to apply for the demonstration and has made significant efforts to inform all PHAs of the demonstration. HUD anticipates that a cross-section of PHAs will apply for the demonstration. HUD will score and select PHAs based on the rating criteria described in Section VIII. Rating Factors.

95. Is there data to support the sample schedule, or is Table 3 purely an illustration with no significance?

The sample schedule was developed based on the minimum enrollment requirements. HUD also developed the schedule in a way that allows PHAs ample time to plan and pilot for implementation. This schedule also allows a steady level of enrollment over multiple years, which HUD believes may help PHAs be more successful at implementation.

96. In developing the research and sample size requirements, what consideration did the department give to the statutory requirements on eligible PHAs and whether all categories of eligible PHAs were likely to be interested in participating?

The statutory eligibility criteria allow for PHAs from all states, regions, and sizes to participate in the demonstration. Although small PHAs may not individually be able to achieve the minimum sample size requirements, they can partner with PHAs to meet that sample size requirement.

97. Under the PBV program, a family may not move from their unit until after a year of occupancy, and then the family can move only if the PHA has tenant-based vouchers (or other comparable tenant-based assistance) available. How would the PHA balance this limitation with a family's desire to move to an opportunity area as a result of the mobility-related services?

PHAs likely will be recruiting and enrolling existing voucher holders at reexamination and at any time the family indicates interest in moving. This will likely include PBV families. All families that participate in the demonstration are likely to have constraints around their ability to move when their lease term expires.

PHAs will be conducting recruitment and enrollment over a six-year period. Families who live in a PBV unit and are interested in moving to an opportunity area but need to wait until a tenant-based voucher is available should still be able to participate in the demonstration given the lengthy enrollment period.

98. The NOFA states that a program may not project-base MDVs, but that an MDV voucher holder may move into a project-based unit. In that case, the NOFA indicates that the

MDV voucher holder would use the existing PHA project-based voucher instead of the MDV, leaving the MDV available for another family.

Yes, this is because the PHA already has PBV units under contract using their existing voucher allocation. Under the regular voucher program when a tenant-based voucher holder moves to a project-based unit, they also relinquish their tenant-based voucher.

In the case above, would the family who chose the project-based unit remain in the randomized control trial (RCT)?

Possibly. HUD will defer to the research evaluators' determination on whether families that move to PBV units remain in the RCT. Some services such as housing search assistance or landlord outreach may not be offered to families choosing to move to PBV units, thus limiting the study design.

Can an applicant with an existing opportunity-area-focused regional project-based voucher program include an estimated number of those project-based vouchers in their application?

Yes, but it is unclear why an applicant would do so. The PHA's estimate of the total number of families to be enrolled in the demonstration is what the mobility-related services funding estimate will be based on.

In theory, a participating PHA could expand the turnover-voucher based portion of the program if some number of MDV voucher holders choose project-based units, thus making their MDVs available for another family. In that case, the applicant PHA would need to estimate how many PBVs might be chosen by MDV voucher holders and request enough mobility counseling to cover both the MDV voucher holders and the families who give up their MDV to occupy a project-based unit. Would such an estimate and increased amount of requested mobility counseling funding be appropriate?

The PHA's estimate of the total number of families to be enrolled in the demonstration is what the mobility-related services funding estimate will be based on. Project-based voucher units could be selected by families participating in the demonstration with new admission MDVs or existing voucher holders. This may be a de minimis concern given the six-year enrollment schedule combined with the small number of MDVs overall.

HUD will work with PHAs after selection to develop a final budget and a final enrollment schedule. At such time, HUD would work with PHAs that believe a significant number of their available MDVs may move to a PBV unit and whether that would result in potentially needing additional mobility-related service funding.

99. Can PHAs recruit existing voucher holders aside from recertification or only when they express a desire to move? In other words, can a PHA reach out to all voucher holders with kids to see if they would be interested in participating?

HUD, the research evaluator, and the TA provider will work collaboratively with PHAs to determine when recruitment efforts will be made. Most likely, recruitment may occur at recertification when a family expresses an interest to move or at another time when a family expresses interest to move. However, it is possible that recruitment could occur by reaching out to all voucher holders with children to see if they would be interested in participating. Given that families will enroll over a six-year period, a large initial recruitment may not be the best approach, but a determination will be made collaboratively after selection on the best approach.

Application

100. For Part L: Program Specific Certifications – If two PHAs are applying jointly, will we submit two attachment #3s, or do we list the certifications twice in one attachment #3?

HUD's preference is for each PHA that is applying to submit individual program specific certifications – in this example, this would mean two attachment 3s would be submitted.

If PHAs want to have different payment standards for demonstration participants and their regular program, they must request a regulatory waiver of 24 CFR 982.503(a)(3) and provide good cause as part of their application. Similarly, if PHAs propose payment standards outside of the basic range, they must request a regulatory waiver of 24 CFR 982.503(b) and provide good cause as part of their application.

101. Should the SF-424 form(s) be submitted via email?

Yes, the SF-424 should be submitted via email as it is a required part of the application. A complete application must be submitted to HCVmobilitydemonstration@hud.gov.

102. Can non-MTW PHAs propose census tract-based payment standard method that can apply to their entire program, not just HUD demo participants?

Yes, in Section VII. Application Format, Part G: Regional Housing Mobility Plan, subpart 4, Approach to Implementing A Housing Mobility Program, PHAs should indicate their

proposed payment standards and the methodology for those payment standards to ensure adequate payment standards in opportunity areas.

103. The federal register notice says that each application must be submitted electronically as a PDF or Microsoft Word document (1997 version or higher) to HCVmobilitydemonstration@hud.gov. Should applicants compile all docs into one pdf? Submit multiple attached docs?

HUD's preference is for all documents to be submitted in PDF format as separate documents. All documents should have the PHA Code in the document name. If the document pertains to more than one PHA, include the lead PHA Code. We have created sample forms and posted them on the HCV Mobility Demonstration website.

104. Can HUD provide clarification on Section VII, Part J, Memorandum of Understanding? Does this require an actual signed Board Resolution, or can it be a letter of support from the Board or Executive Director?

Section VII, Part J, Memorandum of Understanding requires that each PHA participating in a joint PHA application and single PHA applicants submit a board resolution evidencing the PHA's interest in participating in the demonstration, willingness to comply with all applicable requirements and the evaluation, and the reporting requirements in Section XII Reporting and Recordkeeping Requirements. A letter of support from the Board or Executive Director would not meet this requirement.

105. Can a PHA apply to the HCV Mobility Demonstration and the MTW Expansion?

Yes.

106. Can a PHA participate in the HCV Mobility Demonstration and the MTW Expansion?

Any restrictions associated with participating in both the Mobility Demonstration and the MTW Expansion will be published in an update to the Mobility Demonstration Federal Register Notice. HUD anticipates updating the Mobility Demonstration Federal Register notice in the upcoming weeks to address this question further. Additionally, please note that HUD recently extended the application deadline from October 13, 2020 to December 14, 2020.

107. What is the best (most efficient and accurate) method for determining the attrition rate for the past 3 calendar years?

In Section VII Application Format, Part E, Capacity of the Organization, HUD asks for the “voucher program attrition rate for prior three calendar years.” HUD does not specify how the PHA must determine that attrition rate. However, a reliable method for determining the attrition rate would be to review End of Participation transactions submitted to PIC.

108. We are having trouble locating the HAP amount needed to fund a 3-bedroom unit for 12 months in the Voucher Management System. We are able to find the average HAP per unit cost, but not broken down by bedroom size. Can we receive guidance or to help ensure we are utilizing the correct amount?

In Section VII Application Format, Application for Federal Assistance Form SF-424, HUD instructs PHAs to estimate their HAP requests “based on the Voucher Management System or VMS needed to fund a 3-bedroom unit for 12 months. Then the PHA should multiply this number by the number of vouchers they would like to be awarded.” PHAs submit their monthly leasing and cost data to VMS. Using the data set that supports the information submitted to VMS, PHAs should determine what their average HAP for 3-bedroom units is and use that for estimating their MDV HAP request.

109. Does the maximum \$10 million award amount per PHA applicant include mobility-related service and MDV HAP funding?

Yes.

110. Should questions 17 and 18 on Form SF-424 add up to the total amount requested?

In Section VII Application Format, Application for Federal Assistance Form SF-424, Question 17 is not a question about a funding estimate, but rather is a question about the proposed start date and end date of PHA’s participation in the HCV mobility demonstration. HUD’s guidance for Form SF-424 question 17 states, “most applicants should indicate Month, Date, Year—Month, Date Year. However, this is an estimate, and the actual dates will be determined at grant agreement.”

For PHAs applying jointly, each PHA is required to submit a Form SF-424. For PHAs applying jointly, only the lead PHA enters the mobility related service funding request in response to Question 18. All PHAs that request MDVs will put the HAP request for the MDVs in response to Question 18.

111. Can HUD clarify if PHAs applying jointly can submit signed letters of commitment (detailing roles and lead agency) from the PHAs as opposed to formal MOUs? Or will MOUs be given preference in scoring?

Section VII, Part J, Memorandum of Understanding requires that each PHA participating in a joint PHA application and single PHA applicants submit a board resolution evidencing the PHA's interest in participating in the demonstration, willingness to comply with all applicable requirements and the evaluation, and the reporting requirements in Section XII Reporting and Recordkeeping Requirements. HUD does not require that a formal MOU be submitted, but PHAs must submit all required documentation described in Part J, Memorandum of Understanding.

Please see Section VIII, Rating Factors for information on HUD will score and select PHAs.

112. Part D on form HUD-52515 asks PHAs to “Describe how agency jurisdictions are created under state law?” Can HUD provide more guidance on this? (NEW)

Public Housing Agencies are created/authorized under state law. Usually the state law indicates what the PHA operating area/jurisdiction is. For example, some PHAs can administer only in their county or city, while others may administer on a regional basis. PHAs should submit, on Part D on form HUD-52515, to indicate how the PHA’s jurisdiction is determined.

113. Can HUD please clarify what should be used for the funding opportunity number in Section 12 of the SF-424 form as part of this application?

HUD recommends PHAs use the Federal Register docket number in place of the funding opportunity number, which is: FR-6191-N-01.

114. Can HUD clarify what documentation is acceptable for a PHA to indicate that the PHA is in a designated mandatory SAFMRs and all of the PHAs that are applying have implemented the SAFMRs ?

For PHAs applying under Category A, HUD did not specify what documentation is required for PHAs to submit to indicate the PHA is in a designated mandatory SAFMR area and that all of the PHAs that are applying have implemented the SAFMR. PHAs may want to consider providing a statement that they are in a designated mandatory SAFMR

area and supporting documentation that they have implemented the SAFMR. Supporting documentation could include, but is not limited to, a copy of the PHA's current payment standard schedule.

115. If the PHA uses a consulting firm to assist with their grant application, does the company need to be listed on the HUD form 2880?

HUD recommends PHAs review this video if they need assistance completing HUD form 2880: <http://media.gss.hud.gov:8080/WC/2011/02/11/HUDForm2880.wmv>

116. In the sample HUD-52515 Document, the Part F directions read: "all PHAs that request MDVs in Part C, must submit a narrative that describes the need for MDVs. Also in Part F, the single or lead PHA applicant in a joint application will submit one Table 5: Proposed Enrollment and Funding Request. 5 additional pages are permitted and should be submitted in the separate attachment entitled " PHA Code_attachment 1."

From this, the PHA understand that they will only submit one (combined) Table 5. But should all PHAs as part of a joint applicant submit separate attachments for the Part E narrative or should the PHA combine the narrative into one attachment 1 and just provide information specific to each PHA in that one attachment 1?

The narrative for Part E should be combined into one attachment 1. The notice says, "Although only one Part E will be submitted for joint PHA applicants, each PHA must provide the following information at an individual PHA-level. The lead PHA will submit all PHA applicants' information in their Funding Application Form HUD-52515."

117. For HUD-52515, Part G, Subpart 2, Community Partnerships if a PHA is engaging in partnerships with other government agencies, such as housing authorities (that are not part of the joint application) and housing discrimination enforcement agencies should those be categorized as community partnership and described here or is the focus is meant to be only on community based organizations? (NEW)

Yes, the PHA should describe any non-joint PHA applicant partnerships in Part G, Subpart 2, Community Partnerships. That said, if any partners are carrying out any specific parts of the approach, the PHA will want to make that clear in the approach sections, as applicable. PHAs also have the opportunity to provide supporting documentation on partnerships in HUD-52515, Part J MOU.

118. When using the GIS tool for determining eligibility for Categories A and D, Is the 20% within the combined service area based on a selection of high opportunity ZCTA's within a PHA's jurisdiction, or the entire jurisdiction? (NEW)

PHAs should use their entire service area jurisdiction. PHAs should select the entire jurisdiction the PHA is proposing for the demonstration in the ZCTA data tool.

119. As category D applicants, are PHAs only expected to submit screen shots from the HUD website to establish need/eligibility? Is there a narrative that should be accompanying the attachments? (NEW)

Category D applicants must follow the documentation requirements described in Category A. In addition, Category D applicants must define where the demonstration will be implemented. An example of this is if the applicant is a statewide agency, then the PHA would likely identify the metropolitan area(s) of focus. Another example is if the applicant is a large, regional agency, then the PHA likely would identify the neighborhoods of focus.

120. If selected for the HUD demo, is an MTW agency locked into their current MTW plan regarding payment standards? If selected for the HUD Demo, can an MTW PHA exit out of their currently approved MTW payment standard plan and adopt the HUD approved payment standard plan for the demo? (NEW)

HUD's MTW office and the Mobility Demonstration teams will work closely with any MTW agencies that need to adjust their MTW policies and plans because of participation in the demonstration.

121. For joint applicants, does HUD have a preference for PHAs to adopt the same payment standard method across jurisdictions or can each PHA propose different payment standards for each jurisdiction (whether existing or proposed)? (NEW)

The Federal Register notice does not indicate any preference for payment standards except requiring that PHAs provide adequate payment standards in opportunity areas. Rating factor 2 includes an element where the applicant is scored on, "proposed opportunity areas and payment standards" but the Federal Register notice does not provide any further guidance beyond that.

122. On the "Average days to lease as of December 31, 2019" data point is the average days from the time the RFTA is received to lease up? Or is it from the time a voucher is issued to lease up? (NEW)

HUD did not specify exactly how PHAs should calculate the "average days to lease as of December 31, 2019." PHAs may want to consider using the methodology described in the [two year tool](#) for the time from issuance to HAP effective date for the "average days

to lease as of December 31, 2019.” The two year tool describes the time from issuance to HAP effective date as the speed in which vouchers put on the street are leased.

123. Does the Federal Register notice have a typo in the section HUD-52515, Part E Capacity, where it says, “Utilization rate of special purpose vouchers as of December 31, 2019 for (1) HAP expenditures compared to available budget authority and (2) units leased compared to authorized voucher levels.” (NEW)

Yes. Those are separate data points and there was a typo in the Federal Register notice. HUD requires PHAs to submit:

- Utilization rate of special purpose vouchers as of December 31, 2019 for (1) HAP expenditures compared to available budget authority and (2) units leased compared to authorized voucher levels.
- Average days to lease as of December 31, 2019

124. Is 52515, Part G, Subpart 7 of the NOFA to be completed by Category D – Single Agency Applicants? (NEW)

No.

125. With regard to the new [Federal Register Notice](#), will Legacy MTW PHAs that participate in the mobility demonstration have their MTW flexibilities curtailed in the same way as Expansion MTW PHAs in Cohorts 1 and 5? If so, will that be detailed in the MOU the legacy MTW agency signs when participating in mobility demonstration? (NEW)

All MTW PHAs that are selected for the HCV Mobility Demonstration will be evaluated for new policies just like all other selected PHAs. All PHAs that participate in the HCV Mobility Demonstration will execute a MOU with HUD which will describe administrative policies necessary to be adopted to participate. It also will describe the process by which new administrative policies the PHAs seeks to adopt will be reviewed, and if applicable, approved by HUD. Due to the randomized control trial that will be conducted at each PHA site, HUD and the PHAs must work closely together with the research evaluator to ensure that the adoption of any new policies will not interfere with the research underway. PHAs that participate in the HCV Mobility Demonstration have committed to working with HUD to implement the research evaluation effectively.

HUD does not seek to limit MTW innovation and, generally, will only review Legacy MTW PHAs’ activities that interfere with the mobility demo research and/or if it restricts mobility. The activities that will be limited for Expansion MTW PHAs participating in Cohorts 1 and 5 that also participate in the HCV Mobility Demonstration potentially will not be limited in the same way for Legacy MTWs. Here are two examples of a policy some Legacy MTWs might implement that will be restricted for MTW Expansion PHAs

participating in the HCV Mobility Demonstration that may not be restricted for Legacy MTW PHAs.

- Example 1: A Legacy MTW PHA does not have a work requirement at the time it is selected for the HCV Mobility Demonstration. However, three years into their demonstration participation, the PHA decides they want to adopt a work requirement. The Legacy MTW PHA would engage in discussions with HUD and the research evaluator about whether such a work requirement could be adopted.
- Example 2: A Legacy MTW PHA has a work requirement in place at the time it is selected for the HCV Mobility Demonstration. From an HCV Mobility Demonstration research perspective, that work requirement likely would not need to be modified. The PHA simply needs to identify that policy where required in their application so HUD is aware of their current policy environment.