

PHA Name : Lewiston Housing Authority

PHA Code : ME005

MTW Supplement for PHA Fiscal Year Beginning : (MM/DD/YYYY): 7/1/2024

PHA Program Type: Combined

MTW Cohort Number: Landlord Incentives

MTW Supplement Submission Type: Annual Submission

B. MTW Supplement Narrative.

In 2022, Lewiston Housing Authority was selected to become part of the groundbreaking Moving to Work (MTW) program, a distinction recognized during the 25th anniversary of the MTW Demonstration Program. The MTW program, launched by Congress in 1996, provides public housing authorities an opportunity to redefine their operations. It grants them the flexibility to conceive innovative, custom solutions to tackle their community-specific challenges. With the addition of 29 new public housing authorities, the MTW Demonstration Program now boasts 126 participants, distributed across 38 states and the District of Columbia. The MTW initiative cultivates an entrepreneurial ethos, encouraging public housing authorities to devise and implement novel solutions. This initiative has given birth to several pioneering policy interventions that have found successful adoption across the country.

As an MTW participant, Lewiston Housing aspires to achieve its main objectives: cost reduction, fostering self-sufficiency among residents, and broadening housing choices. By leveraging MTW's financial and regulatory flexibility, Lewiston Housing plans to efficiently cater to the growing low-income population in Lewiston, Maine. As a creative real estate manager and a HUD High-performer, Lewiston Housing is committed to meeting the city's increasing demand for affordable housing. The MTW program empowers Lewiston Housing to address significant housing challenges. As per the Real Estate Market Assessment analysis from 2020 and 2021, there has been a sharp increase of 18% to 21% in actual rents for standard 1-, 2-, and 3-bedroom units within a year. The overall rental vacancy rate in Androscoggin County stands at just 2.2%, considerably lower than the standard 5% associated with normal turnover. These data points, coupled with rising rents and household expenses, underscore an urgent need for affordable housing. Lewiston, located north of Portland, has emerged as a significant relocation hub for immigrant and refugee families, as well as Maine families unable to afford the costs in the Portland and coastal regional markets.

Lewiston Housing plans to engage in several MTW activities to enhance cost-effectiveness and expand housing choices for low-income families:

- Alternative Reexamination Schedule for Households (PH) [3.a.]
- Alternative Reexamination Schedule for Households (HCV) [3.b.]
- Self-Certification of Assets (HCV) [3.d.]
- Pre-Qualifying Unit Inspections (HCV) [5.a.]
- Payment Standards - Fair Market Rents (HCV) [2.b.]
- Vacancy Loss (HCV - Tenant-Based Assistance) [4.a.]
- Increase PBV Program Cap (HCV) [9.a.]
- Increase PBV Project Cap (HCV) [9.b.]
- Elimination of PBV Selection Process for PHA-owned Projects Without Improvement, Development, or Replacement (HCV) [9.c.]
- Rental Subsidy Programs [17.a.]
- New Affordable Housing Developments [17.c.]

By adopting these waivers, Lewiston Housing can streamline its operations, reduce expenses, and redistribute resources more effectively, thus fostering increased self-sufficiency among families.

As part of the MTW Landlord Incentive Cohort, through implementing activities 4.a. and 5.a., Lewiston Housing aims to provide incentives to landlords to lease to HCV participants. In view of the limited rental housing and low vacancy rates in Lewiston, the implementation of activities 9.a., 9.b., 9.c., 15, 17.a., and the expanded 17.c. will facilitate the creation of new housing opportunities not currently available for low-income families.

In line with the expanded 17.c waiver, Lewiston Housing proposes two new LIHTC developments, both with Project-Based Vouchers:

1. Martel School Apartments, a two-phase senior housing project comprising 69 units (36 in Phase 1 and 33 in Phase 2). The units will cater to 60% and 50% of AMI, with project-based voucher units available. We plan to allocate \$400,000 towards developing the parcel, which includes site preparation and the demolition of the existing school building. As stipulated by the PIH Notice 2011-45 and section 30 of the 1937 Housing Act, all MTW funding awarded to a third-party provider will be competitively bid.

2. Dewitt Phase 2 is envisaged as a mixed-use property with commercial space in the heart of Lewiston's downtown district. The development will utilize LIHTC, NMTC, and PBVs to serve households at 60% and 50% AMI. This project will exist on the same block as our Choice Neighborhoods' Dewitt Property, creating a model block for the city of Lewiston. As with the Martel School Apartments, all requirements of the PIH Notice 2011-45 and section 30 of the 1937 Housing Act will be followed, with MTW funding competitively bid.

Furthermore, under the new MTW activity 17.a., we propose a rental subsidy program using non-traditional funds for the

fiscal year 2024. Amidst the escalating homelessness crisis in Lewiston, our goal is to maintain and possibly expand the operation of 37 shelter beds in a permanent indoor facility in the city. Our twofold objective is to provide stable shelter for unhoused individuals and to establish a central service center for Lewiston's unhoused population, a pioneering initiative in Androscoggin County.

Funding will be allocated towards maintaining the existing shelter beds and potentially creating new ones at a rate of \$100 per night per bed. This calculates to a total funding amount of approximately \$1,013,800 for the nine months from October 1, 2023, to June 30, 2024. The tenant portion of the rent will be set at \$0, ensuring these shelters remain fully accessible to those most in need. In compliance with PIH Notice 2011-45, we plan to distribute funds to local homeless service providers through a competitive process.

This MTW Supplemental Plan closely aligns with our FY23 submission but with the introduction of two new waiver requests: rental subsidy programs [17.a.] and an expanded request for new affordable housing developments [17c]. Through these measures, we are striving to create more housing options, reduce homelessness, and cater to the comprehensive needs of Lewiston's unhoused population.

C. The policies that the MTW agency is using or has used (currently implement, plan to implement in the submission year, plan to discontinue, previously discontinued).

1. Tenant Rent Policies	
a. Tiered Rent (PH)	Not Currently Implemented
b. Tiered Rent (HCV)	Not Currently Implemented
c. Stepped Rent (PH)	Not Currently Implemented
d. Stepped Rent (HCV)	Not Currently Implemented
e. Minimum Rent (PH)	Not Currently Implemented
f. Minimum Rent (HCV)	Not Currently Implemented
g. Total Tenant Payment as a Percentage of Gross Income (PH)	Not Currently Implemented
h. Total Tenant Payment as a Percentage of Gross Income (HCV)	Not Currently Implemented
i. Alternative Utility Allowance (PH)	Not Currently Implemented
j. Alternative Utility Allowance (HCV)	Not Currently Implemented
k. Fixed Rents (PH)	Not Currently Implemented
l. Fixed Subsidy (HCV)	Not Currently Implemented
m. Utility Reimbursements (PH)	Not Currently Implemented
n. Utility Reimbursements (HCV)	Not Currently Implemented
o. Initial Rent Burden (HCV)	Not Currently Implemented
p. Imputed Income (PH)	Not Currently Implemented
q. Imputed Income (HCV)	Not Currently Implemented
r. Elimination of Deduction(s) (PH)	Not Currently Implemented
s. Elimination of Deduction(s) (HCV)	Not Currently Implemented
t. Standard Deductions (PH)	Not Currently Implemented
u. Standard Deductions (HCV)	Not Currently Implemented
v. Alternative Income Inclusions/Exclusions (PH)	Not Currently Implemented
w. Alternative Income Inclusions/Exclusions (HCV)	Not Currently Implemented
2. Payment Standards and Rent Reasonableness	
a. Payment Standards- Small Area Fair Market Rents (HCV)	Not Currently Implemented
b. Payment Standards- Fair Market Rents (HCV)	Plan to Implement in the Submission Year
c. Rent Reasonableness – Process (HCV)	Not Currently Implemented
d. Rent Reasonableness – Third-Party Requirement (HCV)	Not Currently Implemented
3. Reexaminations	
a. Alternative Reexamination Schedule for Households (PH)	Currently Implementing
b. Alternative Reexamination Schedule for Households (HCV)	Currently Implementing
c. Self-Certification of Assets (PH)	Will be Discontinued in the Submission Year
d. Self-Certification of Assets (HCV)	Currently Implementing
4. Landlord Leasing Incentives	
a. Vacancy Loss (HCV-Tenant-based Assistance)	Currently Implementing
b. Damage Claims (HCV-Tenant-based Assistance)	Not Currently Implemented
c. Other Landlord Incentives (HCV- Tenant-based Assistance)	Not Currently Implemented
5. Housing Quality Standards (HQS)	
a. Pre-Qualifying Unit Inspections (HCV)	Currently Implementing
b. Reasonable Penalty Payments for Landlords (HCV)	Not Currently Implemented
c. Third-Party Requirement (HCV)	Not Currently Implemented
d. Alternative Inspection Schedule (HCV)	Not Currently Implemented
6. Short-Term Assistance	
a. Short-Term Assistance (PH)	Not Currently Implemented
b. Short-Term Assistance (HCV)	Not Currently Implemented
7. Term-Limited Assistance	
a. Term-Limited Assistance (PH)	Not Currently Implemented
b. Term-Limited Assistance (HCV)	Not Currently Implemented
8. Increase Elderly Age (PH & HCV)	

Increase Elderly Age (PH & HCV)	Not Currently Implemented
9. Project-Based Voucher Program Flexibilities	
a. Increase PBV Program Cap (HCV)	Currently Implementing
b. Increase PBV Project Cap (HCV)	Currently Implementing
c. Elimination of PBV Selection Process for PHA-owned Projects Without Improvement, Development, or Replacement (HCV)	Currently Implementing
d. Alternative PBV Selection Process (HCV)	Not Currently Implemented
e. Alternative PBV Unit Types (Shared Housing and Manufactured Housing) (HCV)	Not Currently Implemented
f. Increase PBV HAP Contract Length (HCV)	Not Currently Implemented
g. Increase PBV Rent to Owner (HCV)	Not Currently Implemented
h. Limit Portability for PBV Units (HCV)	Not Currently Implemented
10. Family Self-Sufficiency Program with MTW Flexibility	
a.PH Waive Operating a Required FSS Program (PH)	Not Currently Implemented
a.HCV Waive Operating a Required FSS Program (HCV)	Not Currently Implemented
b.PH Alternative Structure for Establishing Program Coordinating Committee (PH)	Not Currently Implemented
b. HCV Alternative Structure for Establishing Program Coordinating Committee (HCV)	Not Currently Implemented
c.PH Alternative Family Selection Procedures (PH)	Not Currently Implemented
c.HCV Alternative Family Selection Procedures (HCV)	Not Currently Implemented
d.PH Modify or Eliminate the Contract of Participation (PH)	Not Currently Implemented
d.HCV Modify or Eliminate the Contract of Participation (HCV)	Not Currently Implemented
e.PH Policies for Addressing Increases in Family Income (PH)	Not Currently Implemented
e.HCV Policies for Addressing Increases in Family Income (HCV)	Not Currently Implemented
11. MTW Self-Sufficiency Program	
a.PH Alternative Family Selection Procedures (PH)	Not Currently Implemented
a.HCV Alternative Family Selection Procedures (HCV)	Not Currently Implemented
b.PH Policies for Addressing Increases in Family Income (PH)	Not Currently Implemented
b.HCV Policies for Addressing Increases in Family Income (HCV)	Not Currently Implemented
12. Work Requirement	
a. Work Requirement (PH)	Not Currently Implemented
b. Work Requirement (HCV)	Not Currently Implemented
13. Use of Public Housing as an Incentive for Economic Progress (PH)	
Use of Public Housing as an Incentive for Economic Progress (PH)	Not Currently Implemented
14. Moving on Policy	
a. Waive Initial HQS Inspection Requirement (HCV)	Not Currently Implemented
b.PH Allow Income Calculations from Partner Agencies (PH)	Not Currently Implemented
b.HCV Allow Income Calculations from Partner Agencies (HCV)	Not Currently Implemented
c.PH Aligning Tenant Rents and Utility Payments Between Partner Agencies (PH)	Not Currently Implemented
c.HCV Aligning Tenant Rents and Utility Payments Between Partner Agencies (HCV)	Not Currently Implemented
15. Acquisition without Prior HUD Approval (PH)	
Acquisition without Prior HUD Approval (PH)	Not Currently Implemented
16. Deconcentration of Poverty in Public Housing Policy (PH)	
Deconcentration of Poverty in Public Housing Policy (PH)	Not Currently Implemented
17. Local, Non-Traditional Activities	
a. Rental Subsidy Programs	Plan to Implement in the Submission Year
b. Service Provision	Not Currently Implemented

C. MTW Activities Plan that Lewiston Housing Authority Plans to Implement in the Submission Year or Is Currently Implementing**2.b. - Payment Standards- Fair Market Rents (HCV)****Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative**

Through the PIH Expediated Waiver process, we have previously received authorization to increase our Payment Standard to 120% of FMR. Through the MTW waiver request, we would like to continue this waiver which would otherwise expire on December 31, 2023. We are implementing this waiver to increase housing options for voucher holders. Rents continue to increase unprecedentedly, and vacancy rates remain at record lows. Our voucher utilization rate remains low. Returning to a lower Payment Standard would further reduce housing options for our voucher holders. We do not anticipate any cost implications as we are already at 120% FMR through the PIH Expediated waiver.

PLEASE NOTE: A new hardship policy does exist, but due to a bug with the HIP system, we are unable to save it to this waiver. It is uploaded in the related files section.

Which of the MTW statutory objectives does this MTW activity serve?

Housing choice

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Neutral (no cost implications)

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies to all assisted households

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

This is a new implementaion

Does this MTW activity require a hardship policy?

Yes

This document is attached.

Does the hardship policy apply to more than this MTW activity?

No

Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?

No

How many hardship requests have been received associated with this activity in the past year?

No hardship were requested in the most recent fiscal year.

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

Does the MTW activity require an impact analysis?

Yes

This document is attached.

Does the impact analysis apply to more than this MTW activity?

No

Please explain the payment standards by FMR:

We plan to use a payment standard that is 120% of FMR.

3.a. - Alternative Reexamination Schedule for Households (PH)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

Lewiston Housing will use its MTW Authority to begin recertifying all clients in the Housing Choice Voucher Program (HCV) and the Public Housing Program (PH) on a biennial schedule. The documentation requirements for the recertification process are time-consuming and burdensome, and generally, tenant rents do not vary significantly from year to year. By moving to a biennial recertification schedule, Lewiston Housing will be able to reallocate staff time and talent to other program areas, and staff will have more time to ensure income reviews are accurate and thorough. This activity will also encourage work-eligible residents to go back to work as fewer examinations will give these families a financial incentive to return to work.

Families with an unadjusted income of 90 percent or more from fixed income sources will be exempt from this MTW activity. Lewiston Housing will follow guidelines as determined by the FAST Act of 2016.

Lewiston Housing will limit households to one interim recertification annually if the gross household income has decreased by 10% or more. Required interim recertifications (i.e., for changes in household composition or otherwise required by the agency) will not count against the limit.

In planning for waiver approval and the new process, Lewiston Housing has randomly divided the total number of HCV and PH households into two equal groups for biennial reexaminations.

Which of the MTW statutory objectives does this MTW activity serve?

Cost effectiveness; Self-sufficiency

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Decreased revenue

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies only to a subset or subsets of assisted households

Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?

New admissions and currently assisted households

Does the MTW activity apply to all family types or only to selected family types?

The MTW activity applies only to selected family types

Please select the family types subject to this MTW activity.

Other – another specifically defined target population or populations.

If Other Selected in Previous Question: Please describe this target population in the text box.

Those households that are not on a fixed income.

Does the MTW activity apply to all public housing developments?

The MTW activity applies to all developments

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

We submitted our MTW plan on March 1, 2023, and received HUD approval on April 10, 2023. As such, we have not made any accomplishments while writing the new MTW annual plan. We are in the process of implementation.

Does this MTW activity require a hardship policy?

Yes

This document is attached.

Does the hardship policy apply to more than this MTW activity?

Yes

Please list all of the applicable MTW activities. (Only upload hardship policy once when said policy applies to multiple MTW activities.)

3.a. - Alternative Reexamination Schedule for Households (PH); 3.b. - Alternative Reexamination Schedule for Households (HCV)

Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?

No

How many hardship requests have been received associated with this activity in the past year?

No hardship were requested in the most recent fiscal year.

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

Does the MTW activity require an impact analysis?

Yes

This document is attached.

Does the impact analysis apply to more than this MTW activity?

Yes

Please list all of the applicable MTW activities. (Only upload impact analysis once when said impact analysis applies to multiple MTW activities.)

3.a. - Alternative Reexamination Schedule for Households (PH); 3.b. - Alternative Reexamination Schedule for Households (HCV)

What is the recertification schedule?

Once every two years

How many interim recertifications per year may a household request?

1

Please describe briefly how the MTW agency plans to address changes in family/household circumstances under the alternative reexamination schedule.

In these situations, Lewiston Housing will follow its current Administrative Plan and ACOP, which allow for interim examinations should there be a change in household composition or other circumstances that may adversely affect the family.

3.b. - Alternative Reexamination Schedule for Households (HCV)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

Lewiston Housing will use its MTW Authority to begin recertifying all clients in the Housing Choice Voucher Program (HCV) and the Public Housing Program (PH) on a biennial schedule. The documentation requirements for the recertification process are time-consuming and burdensome, and generally, tenant rents do not vary significantly from year to year. By moving to a biennial recertification schedule, Lewiston Housing will be able to reallocate staff time and talent to other program areas, and staff will have more time to ensure income reviews are accurate and thorough. This activity will also encourage work-eligible residents to go back to work as fewer examinations will give these families a financial incentive to return to work.

Families with an unadjusted income of 90 percent or more from fixed income sources will be exempt from this MTW activity. Lewiston Housing will follow guidelines as determined by the FAST Act of 2016.

Lewiston Housing will limit households to one interim recertification annually if the gross household income has decreased by 10% or more. Required interim recertifications (i.e., for changes in household composition or otherwise required by the agency) will not count against the limit.

In planning for waiver approval and the new process, Lewiston Housing has randomly divided the total number of HCV and PH households into two equal groups for biennial reexaminations.

Which of the MTW statutory objectives does this MTW activity serve?

Cost effectiveness; Self-sufficiency

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Decreased expenditures

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies only to a subset or subsets of assisted households

Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?

New admissions and currently assisted households

Does the MTW activity apply to all family types or only to selected family types?

The MTW activity applies only to selected family types

Please select the family types subject to this MTW activity.

Other – another specifically defined target population or populations.

If Other Selected in Previous Question: Please describe this target population in the text box.

Those households not on a fixed income

Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?

The MTW activity applies to all tenant-based units

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

We submitted our MTW plan on March 1, 2023, and received HUD approval on April 10, 2023. As such, we have not made any accomplishments while writing the new MTW annual plan. We are in the process of implementation.

Does this MTW activity require a hardship policy?

Provided Already

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

Does the MTW activity require an impact analysis?

Provided Already

What is the recertification schedule?

Once every two years

How many interim recertifications per year may a household request?

1

Please describe briefly how the MTW agency plans to address changes in family/household circumstances under the alternative reexamination schedule.

In these situations, Lewiston Housing will follow its current Administrative Plan and ACOP, which allow for interim examinations should there be a change in household composition or other circumstances that may adversely affect the family.

3.d. - Self-Certification of Assets (HCV)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

Lewiston Housing will use its MTW Authority to revise the requirements for the verification, calculation, and inclusion of asset income at reexamination for public housing and Housing Choice programs. Verifying and calculating assets is time-consuming, and clients rarely have enough assets to impact the final rent determination. Only 0.4% of Housing Choice Voucher participants have assets greater than \$50,000, and the average assets for HCV residents are \$2023, which, when using the imputed interest rate, equals an annual income of \$1.23, which has no impact on the tenant portion of rent. The activity enables Lewiston Housing to utilize Federal expenditures more efficiently and results in cost and time savings for Lewiston Housing staff.

To streamline the recertification process, Lewiston Housing will:

- Self-Certification of Assets – Households can self-certify all assets when the household's combined value of assets is less than \$50,000.
- For households whose value of their assets is greater than \$50,000, asset verification is subject to standard HUD

verification requirements.

This waiver will be replaced by the new HOTMA rule, which will put this in effect on 1/1/2024.

Which of the MTW statutory objectives does this MTW activity serve?

Cost effectiveness

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Decreased expenditures

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies to all assisted households

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

We submitted our MTW plan on March 1, 2023, and received HUD approval on April 10, 2023. As such, we have not made any accomplishments while writing the new MTW annual plan. We are in the process of implementation.

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

Please state the dollar threshold for the self-certification of assets.

\$50,000.

4.a. - Vacancy Loss (HCV-Tenant-based Assistance)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

This activity is to incentivize and increase landlord participation in the HCV program.

Lewiston Housing will pay up to one month's rent to a landlord whose unit was vacated by a participant of the Housing Choice Voucher program and is occupied by a different participant in the Housing Choice Voucher program. The amount paid will equal the contract rent paid for the vacating HCV participant, and payment will be made only after the execution of a new HAP contract. Should the apartment be vacant for less than one month, then the vacancy loss payment will be prorated based on the number of days the unit is vacant.

Project-Based Vouchers, Mod Rehabs, and any other program that pays vacancy loss will be excluded from participation in this activity. Should the landlord be reimbursed for unpaid rent or vacancy by another source, including a security deposit, then that amount will be deducted from the total vacancy loss paid by Lewiston Housing.

This activity will apply Emergency Housing Vouchers and Mainstream Vouchers that Lewiston Housing administers, as allowed by the specific specialty voucher.

Which of the MTW statutory objectives does this MTW activity serve?

Housing choice

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Increased expenditures

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies to all assisted households

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

We submitted our MTW plan on March 1, 2023, and received HUD approval on April 10, 2023. As such, we have not made any accomplishments while writing the new MTW annual plan. We are in the process of implementation.

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

Does this policy apply to certain types of units or to all units all HCV units or only certain types of units (for example, accessible units, units in a low-poverty neighborhood, or units/landlords new to the HCV program?)

To all units

What is the maximum payment that can be made to a landlord under this policy?

One month contract rent.

How many payments were issued under this policy in the most recently completed PHA fiscal year?

0

What is the total dollar value of payments issued under this policy in the most recently completed PHA fiscal year?

\$0

5.a. - Pre-Qualifying Unit Inspections (HCV)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

This activity is to increase efficiency in operations and increase landlord participation.

A pre-inspection may be conducted within 90 days of the participant occupying the unit. Inspections may be conducted at any time during the 90 days, and previously conducted HQS inspections may be used.

The participant may request an interim inspection.

HQS inspection standards will not be altered as found at 24 C.F.R. 982.401.

Which of the MTW statutory objectives does this MTW activity serve?

Cost effectiveness; Housing choice

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Decreased expenditures

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies to all assisted households

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about

what has been accomplished or changed during the implementation.

We submitted our MTW plan on March 1, 2023, and received HUD approval on April 10, 2023. As such, we have not made any accomplishments while writing the new MTW annual plan. We are in the process of implementation.

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

How long is the pre-inspection valid for?

The pre-inspection is valid for 90 days.

9.a. - Increase PBV Program Cap (HCV)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

Under this activity, Lewiston Housing plans to increase the number of authorized units that allow vouchers to be project-based to encourage development in underserved communities in Lewiston, Greene, Lisbon, Lisbon Falls, and Sabattus. Currently, there are not enough housing units available in Lewiston Housing's catchment area, and there is a need to create more housing opportunities for people who are at or below low income. Lewiston Housing plans to approve up to 50% of authorized HCV units to be project based.

Which of the MTW statutory objectives does this MTW activity serve?

Housing choice

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Neutral (no cost implications)

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies to all assisted households

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

We submitted our MTW plan on March 1, 2023, and received HUD approval on April 10, 2023. As such, we have not made any accomplishments while writing the new MTW annual plan. We are in the process of implementation.

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

What percentage of total authorized HCV units will be authorized for project-basing?

50.00%

9.b. - Increase PBV Project Cap (HCV)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

Lewiston Housing may eliminate or raise the existing cap on the number of units within a project and allow up to 100% of units in a project to be placed under a PBV HAP contract. Lewiston Housing may eliminate or raise the project cap for those PBV Projects the agency determines to be consistent with increasing housing choice. This activity meets the goal of

increasing housing choices and opportunities for people at or below low income.

Lewiston Housing is subject to Notice PIH 2013-27, where applicable, or its successor.

Which of the MTW statutory objectives does this MTW activity serve?

Housing choice

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Neutral (no cost implications)

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies to all assisted households

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

We submitted our MTW plan on March 1, 2023, and received HUD approval on April 10, 2023. As such, we have not made any accomplishments while writing the new MTW annual plan. We are in the process of implementation.

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

9.c. - Elimination of PBV Selection Process for PHA-owned Projects Without Improvement, Development, or Replacement (HCV)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

Lewiston Housing will eliminate the selection process in awarding PBVs to properties owned by the agency that are not public housing without engaging in an initiative to improve, develop, or replace a public housing property or site. A subsidy layering review must be conducted. The agency must complete site selection requirements. An independent entity must perform HQS inspections according to 24 C.F.R. 983.59(b) or 24 C.F.R. 983.103(f). The agency is subject to Notice PIH 2013-27, where applicable, or successor. A single-asset entity of the agency must own property; see Notice PIH 2017-21.

This will help meet Lewiston Housing's goal to improve efficiency and cost-effectiveness, and increase housing choice.

Which of the MTW statutory objectives does this MTW activity serve?

Housing choice

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Decreased expenditures

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies to all assisted households

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

We submitted our MTW plan on March 1, 2023, and received HUD approval on April 10, 2023. As such, we have not made any accomplishments while writing the new MTW annual plan. We are in the process of implementation.

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

17.a. - Rental Subsidy Programs

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

Lewiston Housing is proposing a Moving to Work activity for the remainder of the fiscal year 2024, concentrating on a rental subsidy program that uses non-traditional funds. Amidst Lewiston's escalating homelessness crisis, this proposal aims to maintain and potentially expand the operation of 37 shelter beds in a permanent indoor facility in the city. Our goal is two-fold: to provide a secure and reliable shelter for unhoused individuals and to create a central service center for people who are unhoused in Lewiston, a pioneering initiative in Androscoggin County.

The program plans to allocate the necessary funds towards maintaining the existing shelter beds and potentially creating new ones at \$100 per night per bed. The total funding, set to begin on October 1, 2023, establishes a subsidy rate of \$100 per bed per night. This is prorated for the period from October 1, 2023, to June 30, 2024, for 37 beds. This equals a total funding amount of approximately \$1,013,800 for these nine months. Given the current financial hardship faced by the target population, the tenant portion of the rent will be set at \$0, ensuring these shelters remain fully accessible for those in most need. All shelter guests utilizing this subsidy will be at low income or below. No more than 10% of our HAP budget will be spent on this activity.

In compliance with the provisions of PIH Notice 2011-45, we propose to distribute funds to local homeless service providers through a competitive process. All other requirements of PIH Notice 2011-45 will be followed. Through this proposal, we seek to secure the necessary approval for this MTW activity. Our belief is firm: this targeted approach, dedicated to maintaining and potentially expanding shelter resources while considering the financial hardships of our city's most vulnerable citizens, forms an essential component of Lewiston's holistic response to homelessness. Creating a central service center is an innovative step in this direction, catering to the comprehensive needs of Lewiston's unhoused population.

Our goal is to create housing options for people experiencing homelessness while reducing the overall number of unhoused people in Lewiston.

Which of the MTW statutory objectives does this MTW activity serve?

Housing choice

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Increased expenditures

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

The MTW activity applies to all assisted households

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

new implementation, no previous goals

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

Does the MTW activity apply to all LNT units/properties?

The MTW activity applies to specific units/properties

Describe which LNT units/properties participate in the MTW activity?

This activity is specific to emergency shelter beds created with this Local, Non-Traditional waiver.

Table 17.a.1 - For each third-party partner, please complete the information in the following table.

Third-party Partner	Type of Services the Partner Provides	# of Units Allocated to that Partner for the Fiscal Year
TBD through competitive process	shelter services, resource coordination for guests, day to day operations	37.00

17.c. - Housing Development Programs
<p>Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative</p> <p>We are proposing the use of funds for two new developments. Both will be LIHTC developments with Project Based Vouchers.</p> <p>1) Martel School Apartments will be at least two phases of senior housing comprising a total of 69 units (36 units in Phase 1 and 33 units in Phase 2). All units will be designed at 60% of AMI and 50% of AMI, and project-based voucher units will be available. We intend to allocate \$400,000 toward the development of the parcel. This would involve site preparation and demolition of the existing school building, which has exceeded its usefulness and lifespan. All requirements of PIH Notice 2011-45 and section 30 of the 1937 Housing Act will be followed. MTW Funding awarded to a third-party provider must be competitively bid. We do not intend to use HAP funding.</p> <p>2) Dewitt Phase 2 will be a mixed-use property with commercial space in the heart of Lewiston's downtown district. The property will use LIHTC, NMTC, and PBVs, and all units will be at 60% and 50% AMI. This is on the same block as our Choice Neighborhoods's Dewitt Property, which is mixed-income with commercial. A pro rata calculation will use to determine the number of affordable units at or below low income, which we anticipate exceeding. Our plan to is to create a model block for the city of Lewiston. All requirements of PIH Notice 2011-45 and section 30 of the 1937 Housing Act will be followed. MTW Funding awarded to a third-party provider must be competitively bid. We do not intend to use HAP funding.</p>
<p>Which of the MTW statutory objectives does this MTW activity serve?</p> <p>Housing choice</p>
<p>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</p> <p>Increased revenue; Increased expenditures</p>
<p>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</p> <p>The MTW activity applies to all assisted households</p>
<p>Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.</p> <p>New implementation</p>
<p>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</p> <p>No</p>

Table 17.c.1 - Housing Development Programs that the MTW Agency plans to commit Funds to in Fiscal Year

Name of Development and Address	MTW Role: Acquisition, Rehabilitation, New Construction?	Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other	Number of Affordable Units	Total Number of Units	Number of Units by Affordability - 80% of AMI	Number of Units by Affordability - 50% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other
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Housing Development Programs that the MTW Agency plans to spend funds on in the Fiscal Year

Name of Development and Address	MTW Role: Acquisition, Rehabilitation, New Construction?	Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other	Number of Affordable Units	Total Number of Units	Number of Units by Affordability - 80% of AMI	Number of Units by Affordability - 50% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other
Martel School Apartments	New Construction	LIHTC, PBV *other units are 60% AMI	69.00	69.00	0.00	27.00	0.00	42.00
Dewitt Phase 2	Rehabilitation, New Construction	LIHTC, NMTC, PBV *other units are 60% AMI	200.00	200.00	0.00	80.00	0.00	120.00

Table 17.c.2 - Housing Development Programs that the MTW Agency committed funds to in prior Fiscal Year

Name of Development and Address	MTW Role: Acquisition, Rehabilitation, New Construction?	Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other	Number of Affordable Units	Total Number of Units	Number of Units by Affordability - 80% of AMI	Number of Units by Affordability - 50% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other
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Housing Development Programs that the MTW Agency spent funds on in prior Fiscal Year

Name of Development and Address	MTW Role: Acquisition, Rehabilitation, New Construction?	Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other	Number of Affordable Units	Total Number of Units	Number of Units by Affordability - 80% of AMI	Number of Units by Affordability - 50% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other
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D.	Safe Harbor Waivers.
D.1	<p>Will the MTW agency submit request for approval of a Safe Harbor Waiver this year?</p> <p>No Safe Harbor Waivers are being requested.</p>

E.	Agency-Specific Waiver(s).
E.1	<p>Agency-Specific Waiver(s) for HUD Approval:</p> <p>The MTW demonstration program is intended to foster innovation and HUD encourages MTW agencies, in consultation with their residents and stakeholders, to be creative in their approach to solving affordable housing issues facing their local communities. For this reason, flexibilities beyond those provided for in Appendix I may be needed. Agency-Specific Waivers may be requested if an MTW agency wishes to implement additional activities, or waive a statutory and/or regulatory requirement not included in Appendix I.</p> <p>In order to pursue an Agency-Specific Waiver, an MTW agency must include an Agency-Specific Waiver request, an impact analysis, and a hardship policy (as applicable), and respond to all of the mandatory core questions as applicable.</p> <p>For each Agency-Specific Waiver(s) request, please upload supporting documentation, that includes: a) a full description of the activity, including what the agency is proposing to waive (i.e., statute, regulation, and/or Operations Notice), b) how the initiative achieves one or more of the 3 MTW statutory objectives, c) a description of which population groups and household types that will be impacted by this activity, d) any cost implications associated with the activity, e) an implementation timeline for the initiative, f) an impact analysis, g) a description of the hardship policy for the initiative, and h) a copy of all comments received at the public hearing along with the MTW agency's description of how the comments were considered, as a required attachment to the MTW Supplement.</p> <p>Will the MTW agency submit a request for approval of an Agency-Specific Waiver this year?</p> <p>No Agency-Specific Waivers are being requested.</p>
E.2	<p>Agency-Specific Waiver(s) for which HUD Approval has been Received:</p> <p>Does the MTW agency have any approved Agency-Specific Waivers?</p> <p>MTW Agency does not have approved Agency-Specific Waivers</p>

F.	Public Housing Operating Subsidy Grant Reporting.
F.1	Total Public Housing Operating subsidy amount authorized, disbursed by 9/30, remaining, and deadline for disbursement, by Federal Fiscal Year for each year the PHA is designated an MTW agency.

Federal Fiscal Year (FFY)	Total Operating Subsidy Authorized Amount	How Much PHA Disbursed by the 9/30 Reporting Period	Remaining Not Yet Disbursed	Deadline
2021	\$1,541,900	\$1,541,900	\$0	2029-09-30
2022	\$1,642,620	\$1,642,620	\$0	2030-09-30
2023	\$678,407	\$407,044	\$271,363	2031-09-30

G.	MTW Statutory Requirements.	
G.1	75% Very Low Income – Local, Non-Traditional. HUD will verify compliance with the statutory requirement that at least 75% of the households assisted by the MTW agency are very low-income for MTW public housing units and MTW HCVs through HUD systems. The MTW PHA must provide data for the actual families housed upon admission during the PHA's most recently completed Fiscal Year for its Local, Non-Traditional program households.	
	Income Level	Number of Local, Non-Traditional Households Admitted in the Fiscal Year*
	80%-50% Area Median Income	0
	49%-30% Area Median Income	0
	Below 30% Area Median Income	0
	Total Local, Non-Traditional Households	0

*Local, non-traditional income data must be provided in the MTW Supplement form until such time that it can be submitted in IMS-PIC or other HUD system.

G.2	Establishing Reasonable Rent Policy.
Has the MTW agency established a rent reform policy to encourage employment and self-sufficiency? Yes	

G.3	Substantially the Same (STS) – Local, Non-Traditional.
The total number of unit months that families were housed in a local, non-traditional rental subsidy for the prior full calendar year.	0 # of unit months
The total number of unit months that families were housed in a local, non-traditional housing development program for the prior full calendar year.	0 # of unit months

Number of units developed under the local, non-traditional housing development activity that were available for occupancy during the prior full calendar year:

PROPERTY NAME/ ADDRESS	0/1 BR	2 BR	3 BR	4 BR	5 BR	6+ BR	TOTAL UNITS	POPULATION TYPE*	if 'Population Type' is Other	# of Section 504 Accessible (Mobility)**	# of Section 504 Accessible (Hearing/ Vision)	Was this Property Made Available for Initial Occupancy during the Prior Full Calendar Year?	What was the Total Amount of MTW Funds Invested into the Property?
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G.4	Comparable Mix (by Family Size) – Local, Non-Traditional.
To demonstrate compliance with the statutory requirement to continue serving a 'comparable mix' of families by family size to that which would have been served without MTW, the MTW agency will provide the number of families occupying local, non-traditional units by household size for the most recently completed Fiscal Year in the provided table.	

Family Size:	Occupied Number of Local, Non-Traditional units by Household Size
1 Person	0
2 Person	0
3 Person	0
4 Person	0
5 Person	0
6+ Person	0
Totals	0

H.	Public Comment
Attached you will find a copy of all of the comments received and a description of how the agency analyzed the comments, as well as any decisions made based on those comments.	

I.	Evaluations.
Yes - This table lists evaluations of Lewiston Housing Authority's MTW activities, including the names of evaluators and available reports	

Table I.1 - Evaluations of MTW Policies

Title and short description	Evaluator name and contact information	Time period	Reports available
ABT Associates is completing an evaluation of the landlord incentive program	Hannah Thomas, hannah_thomas@abtassoc.com	2023-2028	none available yet



Hardship Policy for 3.b. Payment Standards – Fair Market Rent (HCV)

The Lewiston Housing Hardship Policy is designed to address the following Moving to Work (MTW) initiatives:

- a) Payment Standards – Fair Market Rent (HCV) – Flexibility to increase payment standard to 120% of Fair Market Rents

Lewiston Housing will use its MTW Authority to maintain our payment standard at 120% of Fair Market Rents. Through the PIH Expediated Waiver process, we have previously received authorization to increase our Payment Standard to 120% of FMR. Through the MTW waiver request, we would like to continue this waiver which would otherwise expire on December 31, 2023. We are implementing this waiver to increase housing options for voucher holders. Rents continue to increase unprecedentedly, and vacancy rates remain at record lows. Our voucher utilization rate remains low. Returning to a lower Payment Standard would further reduce housing options for our voucher holders. We do not anticipate any cost implications as we are already at 120% FMR through the non-MTW waiver.

We do not anticipate this waiver would create a hardship for families as the payment standard would remain the same. Should it have a negative impact on a voucher participant, they may make a hardship request.

Notification plan

The hardship policy will be included in the ACOP and Administrative plan. A copy of this policy will be made available to all households at intake, recertification, and when assistance is to be terminated due to the MTW activity.

Requesting a Hardship

All hardship requests must be made in writing, stating the reason for the hardship, how the hardship has affected the household's ability to pay rent, the risk for housing instability, and the expected duration of families. Hardship requests should be emailed to info@lewistonhousing.org or mailed to Lewiston Housing, 86 Lisbon St, Lewiston, ME 04240. All hardship requests will be recorded and tracked in Lewiston Housing's project management software (Asana).

The MTW activity will be suspended beginning the next month after the request until Lewiston Housing has determined if the request is warranted. If it is determined that the hardship does not exist, the MTW activity will resume, and retroactive rent must be repaid either in full or through a reasonable repayment agreement.

If Lewiston Housing determines that a hardship exists, the household is exempt from the MTW activity as long as the hardship continues. The exemption will apply from the first of the month following the household's request until the later of the end of the qualifying hardship event or the household's next regularly scheduled reexamination.

Reasonable Accommodation

Persons with a disability may request a reasonable accommodation for a change to this policy or MTW activity. Reasonable accommodation requests must be made in writing and include documentation from a medical or healthcare provider that includes certification of the disability, the specific request, and the nexus between the disability and the request. Should the person with a disability need help to complete a reasonable accommodation request, they may reach out to any Lewiston Housing employee for a “Reasonable Accommodation of a Disability Request and Verification” form. Reasonable accommodation requests should be submitted to info@lewistonhousing.org or mailed to Lewiston Housing, 86 Lisbon St, Lewiston, ME 04240

Grievance Procedure

Should the hardship request be denied, the family has a right to a grievance hearing in accordance with Lewiston Housing’s Grievance Procedure. A grievance hearing request must be made in writing within ten business days of receiving the adverse action. The request must specify the grounds upon which it is based and the action requested.



Hardship Policy for 3.a. & b. Alternative Reexamination Schedule for Households (PH & HCV)

The Lewiston Housing Hardship Policy is designed to address the following Moving to Work (MTW) initiatives:

- a) Alternative Reexamination Schedule for Households (PH)
- b) Alternative Reexamination Schedule for Households (HCV)

Lewiston Housing will use its MTW Authority to begin recertifying all clients in the Housing Choice Voucher Program (HCV) and the Public Housing Program (PH) on a biennial schedule. The documentation requirements for the recertification process are time-consuming and burdensome, and generally, tenant rents do not vary greatly from year to year. By moving to a biennial recertification schedule, Lewiston Housing will be able to reallocate staff time and talent to other program areas, and staff will have more time to ensure income reviews are accurate and thorough.

Families with an unadjusted income of 90 percent or more from fixed income sources will be exempt from this MTW activity. Lewiston Housing will follow guidelines as determined by the FAST Act of 2016.

Lewiston Housing will limit households to one interim recertification per year if the gross household income has decreased by 10% or more. Required interim recertifications (i.e., for changes in household composition or otherwise required by the agency) will not count against the limit.

In planning for waiver approval and the new process, Lewiston Housing has randomly divided the total number of HCV and PH households into two equal groups for biennial reexaminations beginning in FY2023. One group will be recertified between July 1, 2023, and June 30, 2024, and the other group will be recertified beginning July 1, 2024.

Financial hardship for an alternative reexamination schedule is for families that face housing instability due to a secondary annual decrease in income and if one of the following has occurred:

- The household has experienced a decrease in income because of changed circumstances, including loss or reduction of employment, death in the assisted household, or reduction in or loss of earnings or other assistance;
- The household has experienced an increase in expenses because of changed circumstances, for medical costs, childcare, transportation, education, or similar items; or
- The loss of income is through no fault of the household, the decrease is not due to a sanction on public assistance income, and the household verifies eligibility or ineligibility for unemployment benefits if the reduced income is due to loss of employment

Notification plan

The Alternative Reexamination Schedule for Households and hardship policy will be included in the ACOP and Administrative plan. A copy of this policy will be made available to all households at intake, recertification, and when assistance is to be terminated due to the MTW activity.

Requesting a Hardship

All hardship requests must be made in writing, stating the reason for the hardship, how the hardship has affected the household's ability to pay rent, the risk for housing instability, and the expected duration of families. Hardship requests should be emailed to info@lewistonhousing.org or mailed to Lewiston Housing, 86 Lisbon St, Lewiston, ME 04240. All hardship requests will be recorded and tracked in Lewiston Housing's project management software (Asana).

The MTW activity will be suspended beginning the next month after the request until Lewiston Housing has determined if the request is warranted. If it is determined that the hardship does not exist, the MTW activity will resume, and retroactive rent must be repaid either in full or through a reasonable repayment agreement.

If Lewiston Housing determines that a hardship exists, the household is exempt from the MTW activity as long as the hardship continues. The exemption will apply from the first of the month following the household's request until the later of the end of the qualifying hardship event or the household's next regularly scheduled reexamination.

Reasonable Accommodation

Persons with a disability may request a reasonable accommodation for a change to this policy or MTW activity. Reasonable accommodation requests must be made in writing and include documentation from a medical or healthcare provider that includes certification of the disability, the specific request, and the nexus between the disability and the request. Should the person with a disability need help to complete a reasonable accommodation request, they may reach out to any Lewiston Housing employee for a "Reasonable Accommodation of a Disability Request and Verification" form. Reasonable accommodation requests should be submitted to info@lewistonhousing.org or mailed to Lewiston Housing, 86 Lisbon St, Lewiston, ME 04240

Grievance Procedure

Should the hardship request be denied, the family has a right to a grievance hearing in accordance with Lewiston Housing's Grievance Procedure. A grievance hearing request must be made in writing within ten business days of receiving the adverse action. The request must specify the grounds upon which it is based and the action requested.



Public Comment

Public notice was posted on March 1, 2023, which is attached to this document. The public comment period ran from March 1, 2023 – April 14, 2023.

Public meetings were held on March 13, 2023 at 11:00 am, March 23, 2023 at 4:00 pm, and April 15, 2023 at 10:00 am.

There were no attendees at the public meetings, and there were no public comments received.

For waivers 17a and 17c, public notice was posted on May 19, 2023, which is attached to this document. The public comment period ran from May 19, 2023 – July 3, 2023.

Public meetings were held on June 1, 2023 at 1:00 pm, June 15, 2023 at 1:00 pm, and July 5, 2023 at 10:00 am.

There were no attendees at the public meetings, and there were no public comments received.



NEWS & STORIES

Moving to Work (MTW) Initial Supplement to PHA Annual Plan Public Notice

in: **Public Notice** on: 03/01/2023

Date of Publication: March 1, 2023

To: All Interested Agencies, Groups, and Individuals:

Lewiston Housing requests public review and comments on Lewiston Housing's Moving to Work (MTW) Initial Supplement of the Annual PHA Plan for July 1, 2023 – June 30, 2024. The public comment period will extend from March 1, 2023, to April 14, 2023.

During the public comment period, Lewiston Housing residents, program participants, landlords, and the general public are invited to participate in a public meeting to review the MTW Supplement, ask questions, and submit comments. If you have a disability and require an alternative form of communication, please submit your request 48 hours before the meeting date(s) to theynen@lewistonhousing.org or 207-783-1423.

Meeting 1: March 13, 2023, 11:00 am

Please follow the link below to register for the webinar:

https://us02web.zoom.us/webinar/register/WN_vitxzvDfQQGvrSFVWqgTBg

Meeting 2: March 23, 2023, 4:00 pm

Please follow the link below to register for the webinar:

https://us02web.zoom.us/webinar/register/WN_oTOvOA_6QEGh6f30paa31g

Following the public comment period, Lewiston Housing residents, program participants, and members of the general public are invited to participate in a public hearing to review the MTW Supplement:

Final Public Meeting: April 15, 10:00 am

Please follow the link below to register for the webinar:

https://us02web.zoom.us/webinar/register/WN_sbHep9mbRzuMuzHKui8oQw

Lewiston Housing will consider all comments received during the public comment period and at the public hearing. It may modify the MTW Supplement and related materials in response to public comments. The Lewiston Housing Board of Commissioners will meet on Saturday, April 15, to take action on the MTW Supplement. This meeting is open to the public. For more information, please contact theynen@lewistonhousing.org

Edit: The April 15, 2023 Board of Commissioners meeting is postponed until further notice due to HUD upgrading the HIP system.

Edit: The April 15, 2023 Board of Commissioners meeting for the MTW plan is rescheduled for April 17, 2023. For more information, please contact theynen@lewistonhousing.org

The MTW Supplement to the Annual PHA Plan and related documents are available for review by request and may be downloaded at:

<https://lewistonhousing.org>.

All written comments or questions should be sent by email to theynen@lewistonhousing.org or mail to Lewiston Housing, attn: Travis Heynen, 86 Lisbon Street, Lewiston, ME 04240. Written comments must be received by the close of the public comment period.



NEWS & STORIES

Moving to Work (MTW) Amended Annual Plan – FY24 PHA Public Notice

in: **Public Notice** on: 05/19/2023

Date of Publication: May 19, 2023

To: All Interested Agencies, Groups, and Individuals:

Lewiston Housing requests public review and comments on Lewiston Housing’s Moving to Work (MTW) Amended Annual Plan for July 1, 2023 – June 30, 2024. The public comment period will extend from May 19, 2023 to July 3, 2023.

During the public comment period, Lewiston Housing residents, program participants, landlords, and the general public are invited to participate in a public meeting to review the MTW Supplement, ask questions, and submit comments. If you have a disability and require an alternative form of communication, please submit your request 48 hours before the meeting date(s) to theynen@lewistonhousing.org or 207-783-1423.

Meeting 1: June 1, 2023, 1:00 pm

Please follow the link below to register for the webinar:

https://us02web.zoom.us/webinar/register/WN_RKn44DmBSFuqtGykxIueQg

Meeting 2: June 15, 2023, 1:00 pm

Please follow the link below to register for the webinar:

https://us02web.zoom.us/webinar/register/WN_ckKfniZXR02h9pXiF2vTVw

Following the public comment period, Lewiston Housing residents, program participants, and members of the general public are invited to participate in a public hearing to review the MTW Supplement:

Final Public Meeting: July 5, 10:00 am

Please follow the link below to register for the webinar:

https://us02web.zoom.us/webinar/register/WN_leUeUg2wRq-N7oD5MANfcA

Lewiston Housing will consider all comments received during the public comment period and at the public hearing. It may modify the MTW Supplement and related materials in response to public comments. The Lewiston Housing Board of Commissioners will meet via email on July 5, 2023, to take action on the MTW Supplement. For more information, please contact theynen@lewistonhousing.org

The MTW Supplement Ammended Annual Plan and related documents are available for review by request and may be downloaded at:

<https://lewistonhousing.org>.

All written comments or questions should be sent by email to theynen@lewistonhousing.org or mail to Lewiston Housing, attn: Travis Heynen, 86 Lisbon Street, Lewiston, ME 04240. Written comments must be received by the close of the public comment period.

MTW CERTIFICATIONS OF COMPLIANCE**U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
OFFICE OF PUBLIC AND INDIAN HOUSING****Certifications of Compliance with Regulations:
Board Resolution to Accompany the MTW Supplement to the Annual PHA Plan**

Acting on behalf of the Board of Commissioners of the Moving to Work Public Housing Agency (MTW PHA) listed below, as its Chairperson or other authorized MTW PHA official if there is no Board of Commissioners, I approve the submission of the MTW Supplement to the Annual PHA Plan for the MTW PHA Fiscal Year beginning (07/01/2023), hereinafter referred to as "the MTW Supplement", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the MTW Supplement and implementation thereof:

- (1) The PHA made the proposed MTW Supplement and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the MTW Supplement and invited public comment.
- (2) The MTW PHA took into consideration public and resident comments (including those of its Resident Advisory Board(s) or tenant associations, as applicable) before approval of the MTW Supplement by the Board of Commissioners or Board of Directors in order to incorporate any public comments into the annual MTW Supplement.
- (3) The MTW PHA certifies that the Board of Directors has reviewed and approved the budget for the Capital Fund Program grants contained in the Capital Fund Program Annual Statement/Performance and Evaluation Report, form HUD-50075.1 (or successor form as required by HUD).
- (4) The MTW PHA will carry out the MTW Supplement in conformity with Title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d-2000d-4), the Fair Housing Act (42 U.S.C. 3601-19), section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794), and title II of the Americans with Disabilities Act of 1990 (42 U.S.C. 12101 et seq.) all regulations implementing these authorities; and other applicable Federal, State, and local civil rights laws.
- (5) The MTW Supplement is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.
- (6) The MTW Supplement contains a certification by the appropriate state or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the MTW PHA's jurisdiction and a description of the manner in which the MTW Supplement is consistent with the applicable Consolidated Plan.
- (7) The MTW PHA will affirmatively further fair housing, which means that it will: (i) take meaningful actions to further the goals identified by the Assessment of Fair Housing (AFH) conducted in accordance with the requirements of 24 CFR 5.150-5.180 and 903.15; (ii) take no action that is materially inconsistent with its obligation to affirmatively further fair housing; and (iii) address fair housing issues and contributing factors in its programs, in accordance with 24 CFR 903.7(o)(3) and 903.15(d). Note: Until the PHA is required to submit an AFH, and that AFH has been accepted by HUD, the PHA must follow the certification requirements of 24 CFR 903.7(o) in effect prior to August 17, 2015. Under these requirements, the PHA will be considered in compliance with the certification requirements of 24 CFR 903.7(o)(1)-(3) and 903.15(d) if it: (i) examines its programs or proposed programs; (ii) identifies any impediments to fair housing choice within those programs; (iii) addresses those impediments in a reasonable fashion in view of the resources available; (iv) works with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement; and (v) maintains records reflecting these analyses and actions.
- (8) The MTW PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975 and HUD's implementing regulations at 24 C.F.R. Part 146.
- (9) In accordance with 24 CFR 5.105(a)(2), HUD's Equal Access Rule, the MTW PHA will not make a determination of eligibility for housing based on sexual orientation, gender identity, or marital status and will make no inquiries concerning the gender identification or sexual orientation of an applicant for or occupant of HUD-assisted housing.
- (10) The MTW PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
- (11) The MTW PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low- or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
- (12) The MTW PHA will comply with requirements with regard to a drug free workplace required by 24 CFR Part 24, Subpart F.
- (13) The MTW PHA will comply with requirements with regard to compliance with restrictions on lobbying required by 24 CFR Part 87, together with disclosure forms if required by this Part, and with restrictions on payments to influence Federal Transactions, in accordance with the Byrd Amendment.
- (14) The MTW PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.

- (15) The MTW PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
- (16) The MTW PHA will provide HUD or the responsible entity any documentation needed to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58. Regardless of who acts as the responsible entity, the MTW PHA will maintain documentation that verifies compliance with environmental requirements pursuant to 24 Part 58 and 24 CFR Part 50 and will make this documentation available to HUD upon its request.
- (17) With respect to public housing and applicable local, non-traditional development the MTW PHA will comply with Davis-Bacon or HUD determined wage rate requirements under section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
- (18) The MTW PHA will keep records in accordance with 2 CFR 200.333-200.337 and facilitate an effective audit to determine compliance with program requirements.
- (19) The MTW PHA will comply with the Lead-Based Paint Poisoning Prevention Act and 24 CFR Part 35.
- (20) The MTW PHA will comply with the policies, guidelines, and requirements of 2 CFR Part 200.
- (21) The MTW PHA must fulfill its responsibilities to comply with and ensure enforcement of housing quality standards as required in PIH Notice 2011-45, or successor notice, for any local, non-traditional program units. The MTW PHA must fulfill its responsibilities to comply with and ensure enforcement of Housing Quality Standards, as defined in 24 CFR Part 982, for any Housing Choice Voucher units under administration.
- (22) The MTW PHA will undertake only activities and programs covered by the Moving to Work Operations Notice in a manner consistent with its MTW Supplement and will utilize covered grant funds only for activities that are approvable under the Moving to Work Operations Notice and included in its MTW Supplement. MTW Waivers activities being implemented by the agency must fall within the safe harbors outlined in Appendix I of the Moving to Work Operations Notice and/or HUD approved Agency-Specific or Safe Harbor Waivers.
- (23) All attachments to the MTW Supplement have been and will continue to be available at all times and all locations that the MTW Supplement is available for public inspection. All required supporting documents have been made available for public inspection along with the MTW Supplement and additional requirements at the primary business office of the PHA and at all other times and locations identified by the MTW PHA in its MTW Supplement and will continue to be made available at least at the primary business office of the MTW PHA.

Lewiston Housing Authority

ME005

MTW PHA NAME

MTW PHA NUMBER/HA CODE

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802).

Chris Kilmurry

Executive Director / Secretary of the Board

NAME OF AUTHORIZED OFFICIAL

TITLE

Christopher Kilmurry

Jul 17, 2023

SIGNATURE

DATE

**** Must be signed by either the Chairperson or Secretary of the Board of the MTW PHA's legislative body. This certification cannot be signed by an employee unless authorized by the MTW PHA Board to do so. If this document is not signed by the Chairperson or Secretary, documentation such as the by-laws or authorizing board resolution must accompany this certification.***






50075-MTWCertOnly

Final Audit Report

2023-07-17

Created:	2023-07-17
By:	Travis Heynen (theynen@lewistonhousing.org)
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