



## Notice of Funding Availability for HUD's Fiscal Year 2017 Mainstream NOFA: Frequently Asked Questions

Any questions submitted to [MainstreamVouchers@hud.gov](mailto:MainstreamVouchers@hud.gov) will be answered in this document. The document will be updated periodically and reposted with the date it was updated.

As of 5.15.18, questions are now organized into the following topic areas:

1. Accessing and Completing the NOFA.....	1
2. NOFA Applicant Eligibility .....	7
3. Project-Basing Mainstream Voucher Assistance .....	9
4. Partnerships .....	11
5. Portability.....	13
6. Targeting and Waiting List Administration .....	14
7. Mainstream Voucher Administration .....	20
8. Funding .....	22

### [1. Accessing and Completing the NOFA](#)

#### **1.1. How do I download the NOFA from Grants.gov?**

- To download the NOFA from the [View Grant Opportunity](#) page on Grants.gov, click on the "Package" tab.
- Click "Apply" in the far right column. (Note: You may also view the NOFA by clicking "Preview", however, starting the application process is recommended so you will get updates about the application package. If you click "Preview" skip to step 4 below.)
- Login or register.
- Click the "Download Instructions" button.
- A zip file will download to your computer. The full text of the NOFA will appear in this folder as "Mainstream NOFA".

For more information on how to use Grants.gov, visit the [Online User Guide](#).

#### **1.2. Is there an official website for the Mainstream Voucher program?**

HUD is working on developing a webpage for the Mainstream Voucher program. For now, all current information about the Mainstream Voucher program may be found in the Highlights



section of the [HCV program homepage](#). Information about this NOFA is also available on HUD's [Funding Opportunities webpage](#).

### **1.3. Is there any guidance on how long the narratives can be?**

HUD has not set a limit to the length of the narratives in the application. The narratives are meant to be provided as part of completing the HUD-52515 Funding Application. The applicant agency may attach additional pages if necessary. HUD expects agencies to focus their responses on the critical information required to answer the narrative prompts listed under #5 in Section B. 1. Content (on page 20 of 32 of the NOFA).

### **1.4. Where can I find the form HUD-52515?**

The form HUD-52515 is part of the NOFA package available on Grants.gov.

- a) To download the form HUD-52515 from the [View Grant Opportunity](#) page on Grants.gov, click on the "Package" tab.
- b) Click "Apply" in the far right column. (Note: You may also view the NOFA by clicking "Preview", however, starting the application process is recommended so you will get updates about the application package. If you click "Preview" skip to step 4 below.)
- c) Login or register.
- d) Click the "Download Instructions" button.
- e) A zip file will download to your computer. The HUD-52515 will appear in this folder as "HUD-52515".

### **1.5. I am trying to complete the Promise Zone Certification Form (HUD Form 50153) but the link is not functioning. How do I complete this form?**

The FY2017 Mainstream NOFA does not provide a preference for Preferred Sustainability Status (PSS) Communities, therefore, Form 50153 is not part of the application package and will not be considered when reviewing applications.

### **1.6. Is there a maximum number of vouchers that a PHA may apply to receive under this grant?**

The NOFA sets a maximum amount per award of \$5,000,000, including HAP and administrative expenses. The NOFA does not set a maximum number of vouchers. The NOFA requires applicants to provide a minimum and maximum number of vouchers they will accept. PHAs may estimate the number of vouchers that could be funded in their jurisdiction with \$5,000,000 based on their local HAP and administrative fee costs.

### **1.7. How do we comply with the option to apply directly detailed in page 18 "Option to Apply Directly" of the Mainstream NOFA?**

PHAs must accept applications from eligible applicants even if they are not referred through a partner agency. If its waiting list is closed, the PHA must comply with the requirements for



opening the waiting list under 24 CFR 982.206, including the requirement to provide public notice and to accept applications from families for whom the list is open.

**1.8. Please advise if the PHA applying for voucher funding for mainstream vouchers, completes section C of the HUD form 52515 ...Average Monthly Adjusted Income for vouchers by bedroom ....it would be an estimated projection, or do we leave that area blank?**

Leave that area blank. Full instructions for the HUD-52515 are included on page 20 of the NOFA.

**1.9. Can you provide more information on completing the HUD Form 52515 part B? Is a PHA required to complete this section using the top of the current Section 8 waitlist? If so, can you provide more clarity on how to do this? Should we filter for non-elderly and disabled? My concern is that this won't provide details regarding homeless status or institutional setting.**

This section of the HUD-52515 is not required. Please refer to the instructions on page 20 of the NOFA which lists all of the information that must be included on the HUD-52515.

**1.10. Can you provide me with copies of two or three recent successful applications that were funded?**

No, mainstream voucher assistance has not been funded since 2005. This is also the first time that HUD is using the criteria in the FY17 Mainstream NOFA to award funds.

**1.11. On page 3 of the NOFA it talks about the Assessment of Fair Housing (AFH). Does this have to be submitted?**

The AFH does not need to be submitted as a part of this NOFA. Requirements for when AFHs are due are not affected by the NOFA. Please refer to the Office of Fair Housing and Equal Opportunity for questions about when the AFH is due for your PHA or local jurisdiction.

**1.12. I have no other governmental funding going into the mainstream vouchers – however the form 2880 requires we complete this section of the form. How am I to complete it?**

Leave that portion of the form blank.

**1.13. Is the Disclosure of Lobbying Form required if we do not conduct lobbying activities?**

The SF-LLL Disclosure of Lobbying Form is only required if the applicant has lobbying activities to disclose. All applicants must complete the [Certification of Lobbying Form](#).



**1.14. On Page 20 of the NOFA, Section D, the narrative responses refer to PHA and partner organization’s experience and capacity. When referencing “partner”, are these new partnerships or existing/past partnerships, or both? Page 26 of the NOFA (Capacity and Experience) makes reference to partners in a past tense form (i.e., partnered, collaborated, etc.). The two sections appear inconsistent. Seeking clarification.**

The partnership may be either new or existing. The information provided in response to Section D about the PHA and the partner agency may refer to activities that each entity completed individually or as partners.

**1.15. The HUD 52515 that I found online expired 4/30/2018 and does not follow the questions in the RFP. Can you please direct me to where I can find the correct form?**

The version of the form that expires on 4/30/2018 is the most recent version of the form. Please use this version along with the instructions on page 20 of the NOFA.

**1.16. Where within Form HUD-52515 is the PHA to declare the minimum and maximum number of vouchers they will accept?**

Enter the minimum and maximum under Section B on the first page of the HUD-52515, clearly labeled with “minimum” and “maximum”.

**1.17. Why is the Form HUD 52515 not included in the web application nor is it listed as a mandatory form?**

The HUD-52515 is not a fillable form, so it cannot be completed electronically through Grants.gov or its Workspace functionality. Instead, complete the form on paper (or using your own PDF software) and upload to the application.

**1.18. Could you please provide a sample letter of intent or memoranda of agreement?**

HUD will not be providing a sample letter of intent or memoranda of agreement. The requirements for these documents are described on page 21 of the NOFA. HUD will be evaluating these documents based on the Review Criteria described under Leveraging Resources in the NOFA (page 28).

**1.19. Will this NOFA be completed thru esnaps?**

No, the application must be submitted through Grants.gov.

**1.20. Who is the appropriate contact to address letters of support for an entity applying for HUD’s Mainstream Voucher Program?**

There is no specific contact.



**1.21. What information do I need to enter on the HUD-52515 form, which sections are required?**

The information that HUD needs in order to evaluate your application is listed on page 20-21 of the NOFA. If there is not a space to enter the information required, clearly label the required information on the form or on an attached piece of paper.

**1.22. In the Mainstream Voucher NOFA, the Prohibition Against Lobbying Activities section states that "Applicants must submit the SF-LLL if they have used or intend to use non-federal funds for lobbying activities." According to this, our agency does not need to submit the SF-LLL with our application, but it is listed as a required form in the [grants.gov](https://www.grants.gov) workspace with required fields to fill out before submitting. How should we fill out the SF-LLL if we do not engage in lobbying?**

Upload a blank copy of the form.

**1.23. We are currently attempting to apply for the Mainstream NOFA, but unable to click the "Apply" button on grants.gov.**



FR-6100-N-43  
2017 Mainstream Voucher Program  
Department of Housing and Urban Development

[« Back | Link](#)

Apply

Subscribe

Verify that you have added an organization applicant profile to your account. After logging in, go to My Account, then Manage Profiles to add an organization. For additional help with Grants.gov, contact Applicant Support at 1-800-518-4726.

**1.24. Form 424 item 5a. asks for the Federal Entity Identifier. Is this the PHA number assigned by HUD? If not, please advise as to where this number is found.**

Use the PHA Code. The code begins with a two-letter state code and ends with three numbers.

**1.25. We do not have any lobbying activities to disclose on the SF-LLL, but we are not able to proceed without completing the form.**

Please enter the following text in all 4 name fields of box 10.a. and 10.b. "NA, no federal funds spent lobbying." If you already submitted the application using a different workaround, HUD will accept that workaround. You do not need to resubmit the application.

**1.26. The 2880 form requests disclosures of interested parties in Part III of the form. Should the PHA include the service partners in this portion of the form?**

The applicant should include any person or entity that has a financial interest in the funds awarded through this NOFA. Whether the service partners have a financial interest depends on the structure of the arrangement with the service partners.



**1.27. What are the instructions for completing the HUD-2880?**

There are no special instructions for completing the HUD-2880. Please follow the instructions provided on the form.

**1.28. The top section of form 52515 has the instructions to “Send the original and two copies of this application form and attachments to the local HUD Field Office” Is this requirement only for those who received a waiver, or should we also submit hard copies to our local HUD office?**

If you completed the application electronically, which is required unless you submitted a waiver with good cause 15 days prior to the application deadline, you do NOT need to submit the HUD-52515 via mail. Please disregard this language on the HUD-52515.

**1.29. Where should the HUD-52515 form be uploaded on the workspace console? Should it be one of the attachments or part of the SF-424?**

Please upload as an attachment.

**1.30. The program's Grants.gov page (<https://www.grants.gov/web/grants/view-opportunity.html?oppld=303764>) indicates that the deadline for the program has been extended to June 20, 2018. However, the program's solicitation continues to provide the old deadline of June 18, 2018. Could you please clarify at your earliest convenience?**

The deadline for applications is June 20, 2018.

**1.31. On the SF-424, what should be entered in #4 Applicant Identifier?**

Leave blank or enter NA.

**1.32. On the SF-424, what should be entered in #5.b Federal Award identifier?**

Here are the instructions provided in Grants.gov: For new applications, leave blank. For a continuation or revision to an existing award, enter the previously assigned federal award identifier number. If a changed/corrected application, enter the federal identifier in accordance with agency instructions.

If you do not have a federal award identifier number, leave blank or enter NA.

**1.33. How do we complete SF-424 #14 Areas Affected by Project. – what is to be entered as the area affect by the project? This is not a fillable field. Is an attachment required, and if so, what should it contain?**

Here are the instructions provided in Grants.gov: This data element is intended for use only by programs for which the area(s) affected are likely to be different from the place(s) of



performance reported on the SF-424 Project/Performance Site Location(s) Form. Add attachment to enter additional areas, if needed.

If this does not apply to you, then leave blank or enter NA.

**1.34. On the SF-424, how do I determine what to enter for #18 estimated funding?**

The amount of funding you are requesting should be entered under “a. Federal.” See question 8.12 in this document for information on how to estimate funding.

**1.35. On the SF-424, how do I answer #19 E.O 12372 Review?**

Here are the instructions provided in Grants.gov: Applicants should contact the State Single Point of Contact (SPOC) for Federal Executive Order 12372 to determine whether the application is subject to the State intergovernmental review process. Select the appropriate box. If “A.” is selected, enter the date the application was submitted to the State.

**2. NOFA Applicant Eligibility**

**2.1. Are Indian Housing Authorities (IHAs) eligible?**

IHAs are not eligible to apply. Only PHAs that administer housing choice voucher (HCV) assistance and non-profits that already administer HCV mainstream assistance are eligible to apply. IHAs are not eligible to administer housing choice voucher assistance.

**2.2. For a PHA to qualify, does the authority need to have an existing voucher program?**

Yes, only PHAs that administer housing choice voucher assistance are eligible to apply.

**2.3. We are a small PHA. Does our PHA have to be a certain size to be awarded mainstream vouchers?**

There is not a minimum PHA size. The minimum funding that may be awarded is \$75,000. PHAs should consider their capacity to lease these vouchers when considering how much funding to request.

**2.4. Our PHA only administers vouchers, we do not have any public housing units. Are we eligible to apply?**

Yes, PHAs that administer only housing choice vouchers are eligible to apply.

**2.5. We are a Tribally Designated Housing Entity (TDHE). Are we eligible to apply for mainstream assistance?**

No, TDHEs are not eligible to administer housing choice voucher assistance. Only PHAs that already administer housing voucher assistance are eligible.



**2.6. Is a Housing Agency (non-profit organization) that currently administers mainstream vouchers allowed to apply for the current NOFA for mainstream vouchers?**

Yes.

**2.7. May a non-profit organization not currently administering HCV but currently receiving HUD Continuum of Care funding apply directly for this funding if their local PHA declines to apply for this funding?**

No, the non-profit would need to partner with a PHA that operates an HCV program or a non-profit that already operates mainstream voucher assistance.

**2.8. Can three PHAs do one joint application for the mainstream NOFA?**

One PHA would need to be the lead and therefore the actual applicant, as the vouchers will be allocated to one PHA for each award. The lead PHA could partner with other PHAs for services or create an agreement with other PHAs allowing them to administer vouchers in each other's jurisdictions.

**2.9. We are a nonprofit homeless service provider that also administers mainstream vouchers. As such we are eligible to apply for new vouchers, but we would not need to bring in a second service provider, as we do both the administration of the vouchers and supportive services/ tenant services. How do we reflect this in the application, given the scoring around partnerships?**

Applications will be rated on PHA and partner capacity as well as leveraging resources. In this case, your organization is both the PHA and the partner agency. Provide your relevant experience as a PHA and as a partner agency providing supportive service and tenant services.

**2.10. I am a non-elderly person with disabilities who needs housing, may I apply for assistance?**

No, only PHAs that administer voucher programs and non-profits that administer mainstream voucher assistance are eligible to apply for funding. Once awarded, the agencies that receive funding will use the funds to assist non-elderly persons with disabilities.

**2.11. I am a small business owner. May I apply to receive assistance under this NOFA?**

No, only PHAs that administer voucher programs and non-profits that administer mainstream voucher assistance are eligible to apply for funding.

**2.12. Can a PHA apply if it has lawsuit pending from a tenant?**

It depends on the details of the lawsuit. Page 11 of the NOFA describes examples of Civil Rights lawsuits that may disqualify a PHA.





**2.13. May a PHA that is facing a budget shortfall and applying for the shortfall set-aside apply for mainstream voucher assistance?**

There is no prohibition on shortfall PHAs receiving new allocations of special purpose vouchers. HUD may consider shortfall status when evaluating a PHA's previous performance and capacity to administer mainstream voucher assistance. HUD may seek additional information from the PHA's local field office to determine the reason for the shortfall.

**2.14. Could a For Profit agency partner with a local Housing Authority to apply for the NOFA?**

Yes. There is no prohibition on a PHA partnering with a for-profit agency. The PHA must comply with all program requirements with respect to the partnering arrangement. The partnering agency must be able to fulfill all its obligations under the NOFA and must comply with all applicable program requirements.

**2.15. Can a nonprofit organization (currently administering 50 Mainstream Vouchers in one county) apply for additional vouchers in outside its current jurisdiction if working statewide?**

As with traditional PHAs, nonprofits are responsible for identifying the geographic area in which they may administer vouchers consistent with applicable state and local laws and the nonprofit's organizational documents.

**3. Project-Basing Mainstream Voucher Assistance**

**3.1. Are we permitted to project-base mainstream vouchers?**

Yes, mainstream vouchers may be project-based. The Frank Melville Supportive Housing Investment Act of 2010 converted mainstream assistance to tenant-based assistance under 8(o) of the United States Housing Act of 1937. Tenant-based assistance may be converted to project-based assistance under (8)(o)(13) of the same Act.

Given the population served by the mainstream voucher program, PHAs need to be particularly mindful of fair housing requirements. The owner and the PHA are responsible for ensuring that, in addition to complying with project-based voucher program requirements, the project complies with all applicable Federal nondiscrimination and civil rights statutes and requirements. This includes, but is not limited to, Section 504 of the Rehabilitation Act (Section 504), titles II or III of the Americans with Disabilities (ADA), and the Fair Housing Act and their implementing regulations at 24 CFR part 8; 28 CFR parts 35 and 36; 24 CFR part 100.

**3.2. May a PHA enter into an agreement to allocate all of or a portion of its awarded mainstream voucher funding and/or vouchers to a local partner organization who owns and operates supportive housing units for the disabled, homeless, at risk of homelessness, etc? This would be similar to project-based vouchers or sponsor based rental assistance.**



The answer depends on the specific nature of the arrangement. The HCV program, including the mainstream voucher program, does not have a sponsor based rental assistance component. Assistance under this NOFA must be used as tenant-based assistance (consistent with requirements in 24 CFR part 982, the NOFA and other applicable requirements) or project-based voucher assistance (consistent with consistent with 24 CFR part 983, the NOFA, and other applicable requirements). The PHA would have to structure any arrangement in a manner that is consistent with one of these two options. The PHA must comply with all Federal nondiscrimination and Civil Rights requirements (which are stated in the NOFA).

### **3.3. Can a property that receives Mainstream PBV/TBV be 100% Permanent Supportive Housing?**

HUD cannot answer general questions about a PHA's ability to project-base vouchers in a particular building. There are too many factors that affect compliance and eligibility. PHAs must be familiar with and comply with all project based voucher rules and regulations, as well as all Fair Housing requirements. Please see 24 CFR Part 983 as well as [PIH Notice 2017-21\(HA\) Implementation Guidance: Housing Opportunity Through Modernization Act of 2016 \(HOTMA\) — Housing Choice Voucher \(HCV\) and Project-Based Voucher \(PBV\) Provisions](#). HUD also strongly recommends PHAs that are considering project-basing mainstream vouchers consult with their local HUD Office of Fair Housing and Equal Opportunity. These vouchers serve non-elderly persons with disabilities, and project-basing vouchers on behalf of this population involves significant fair housing considerations.

### **3.4. Is there a limit on the number of Mainstream vouchers that can be utilized in a single site property?**

If the mainstream vouchers are tenant-based, there is not a limit. If the PHA would like to convert to project-based assistance, please see answer to question 3.3 above.

### **3.5. There is a Permanent supportive housing provider that we would like to partner with that has scattered sight housing. Some of the housing units are Single Room Occupancy (SRO) which consist of 4 bedrooms, shared Kitchen and Living Room or 2 bedrooms with shared Living areas. They also have an apartment/efficiency complex. 100% of the clients housed by this provider are Disabled. Our concern is that this may be considered as an institution or other segregated setting since 100% of the clients are disabled. Can you please define what HUD considers an institution or segregated setting?**

It is unclear whether the question is referring to using tenant-based or project-based assistance. For tenant-based assistance, the PHA cannot require the voucher recipient to live in the partner agency's unit. There are special rules for SROs at 24 CFR 982.605. For project-based assistance, please see the answer to 3.3 above.



### **3.6. Since mainstream vouchers may be project based, how would that work with portability requirement, if the vouchers are tied to a place or project?**

If a tenant chooses to lease a project-based unit, the tenant has the ability to terminate the lease at least after one year of tenancy in the project-based unit. Per 24 CFR 983.261(c), the tenant may request tenant-based assistance. The tenant may choose to live in the jurisdiction or move outside the jurisdiction using portability.

## **4. Partnerships**

### **4.1. Is it correct to assume that partnerships for support services are encouraged but not required since high points are being given to entities that allow voucher holders to port before leasing up locally?**

Developing a partnership is not a threshold requirement, which means applications without partnerships will be considered and scored based on the review criteria described in the NOFA.

Based on the review criteria, it would be difficult for a PHA to be competitive without developing any sort of partnership. A few of the review criteria relate directly to the PHA's partnership(s) and partner agency/agencies, accounting for up to 55 points out of 100 points. The following criteria consider the partner agency or agencies and the PHA's plan for communication and program evaluation with the partner agency/agencies.

- Rating Factor 1b. Partner Agency Capacity (up to 15 points)
- Rating Factor 2. Leveraging Resources (up to 30 points)
- Rating Factor 3. Achieving Results and Program Evaluation (up to 10 points)

The question specifically asks about "partnerships for support services". It is unclear if the person who submitted the question is referring to whether a particular type of partnership or type of service offered by a partner agency is required. Please refer to the instructions for completing the narrative portion of the Funding Application (HUD-52515) on page 20 of the NOFA. #5 asks PHAs to describe the PHA and partner organization(s)'s experience and capacity providing certain types of services. Also refer to the Rating Factors listed above (pages 27-29) for more information on how partnerships will be evaluated and scored.

### **4.2. While the terms of the NOFA state that we cannot require that applicants be referred through a partnering agency, we feel that our partners are much better equipped to verify both program eligibility and prioritization (whether applicants are exiting an institution, homeless/at-risk of homelessness, etc.). Once people have applied for these vouchers, and have self-identified as being eligible, can we consult with our partnering agencies to help us verify applicant eligibility and preference/priority?**

Yes, PHAs are responsible for meeting all verification and documentation requirements for the voucher program. There is no prohibition on partner agencies helping with these activities as long as all requirements related to privacy, PII, and file documentation are met.



**4.3. Our PHA has a written a letter of support for our HUD-VASH vouchers from the VA Health Care System. Could this letter from the Department of Veterans Affairs Health Care System be used to get points under rating factor 2. Leveraging Resources? This letter demonstrates partnerships with institutions that work with individuals at risk-of becoming homeless. The letter indicates the number of vouchers issued to the PHA, and also provides support to the PHA through way of clinical staff and case management. Our PHA also has an memorandum of understanding (MOU) with an organization that provides referrals to the PHA through the Violence Against Women's Act. Could we use this MOU as way of demonstrating partnerships with agencies that provide outreach and referrals?**

Rating factor 2 Leveraging Resources is intended to evaluate the resources that the PHA is leveraging through partnerships to implement the mainstream voucher program. Partnerships that are considered through the Leveraging Resources rating factor do not need to exclusively support the mainstream voucher program, however, they must provide some resources and support to assist applicants in accessing housing under the mainstream voucher program. Generally, a partnership that is specifically or a distinct program like HUD-VASH would not be considered a leveraged partnership for the mainstream voucher program.

Experience or other partnerships that the PHA has specifically for other special voucher programs that primarily serve persons with disabilities, such as HUD-VASH, will be considered under rating factor 1a. PHA Capacity and Demonstrated Commitment to Provide Housing for Persons with Disabilities.

Please note that rating factors 1a and 2 refer to experience assisting persons with disabilities. The example of an MOU with the Center Against Sexual and Family Violence would be unlikely to receive points under either factor unless the clientele served is primarily persons with disabilities.

**4.4. One of our allied agencies that work with individuals with developmental disabilities would like to partner with our public housing authority regarding the mainstream voucher program. They own several group homes throughout the county as well as provide day habilitation and case management services. If we were to be awarded mainstream vouchers and worked with this agency would it be considered a conflict if said agency referred an individual to the mainstream program, the client obtained a voucher and the agency also assisted the client with housing by referring them to one of their own group homes?**

The referring agency could not require or steer an individual that receives a tenant-based voucher live in particular properties. Conflict of interest issues are fact-specific, and HUD cannot provide answers through an FAQ.



## 5. Portability

### 5.1. Will receiving PHAs be allowed to bill or absorb port-in vouchers?

Yes, the receiving PHA has the same option to bill or absorb as with regular HCV assistance.

### 5.2. If receiving PHAs are billing for port-ins, will there be a deadline for them to absorb the vouchers into their own program?

No, the same portability rules and guidelines apply for mainstream assistance as for regular HCV assistance.

### 5.3. May our PHA administer mainstream vouchers outside of our jurisdiction without going through the portability process?

PHA jurisdictions are set at the state and local level. HUD released a short guide for PHAs on [“Existing Authorities to Promote Housing Choice Voucher Mobility”](#). A few points under the Portability section of this guide may be helpful for PHAs looking to develop agreements with nearby PHAs to streamline portability or expand their jurisdiction:

PHA agreements to streamline portability. PHAs have the ability to enter into agreements with one another to facilitate portability from one jurisdiction to the other. These agreements typically specify standardized procedures for handling portability between the two jurisdictions that reduce delays and allow procedures to be explained clearly to families interested in moving.

Expanding geographical scope of voucher administration. Some states allow voucher agencies to administer the HAP contracts of families residing in the jurisdiction of other PHAs (e.g., with the consent of the other PHA in question). Where this is permitted, a PHA may elect to continue administering such HAP contracts in order to negate the need for a formal “portability” move, for example if a family seeks to live in an opportunity area in the jurisdiction of another PHA. In some cases, PHAs may choose to contract with neighboring PHAs to execute certain functions – such as HQS inspections – to facilitate this type of arrangement.

### 5.4. Our general portability policy requires applicant families to live in our jurisdiction for 12-months before requesting portability, but our policy also states that we will “consider exceptions to this policy for purposes of reasonable accommodation or reasons related to domestic violence, dating violence, sexual assault or stalking.”

In order to receive points, the PHA would need to adopt a policy that allows for portability upon voucher issuance. PHAs are required to allow for reasonable accommodations for persons with disabilities. Please note that adopting an immediate portability policy is not required to be eligible. It is one way of getting points under criteria 1c. Alternatively, the PHA could work with local PHAs to expand its jurisdiction and receive 5 points under 1c.



## 6. Targeting and Waiting List Administration

### **6.1. Does a PHA need to target all four populations - non-elderly persons with disabilities who are transitioning out of institutional or other segregated settings, at serious risk of institutionalization, homeless, or at risk of becoming homeless – in order to receive the maximum number of points provided in the NOFA? Can the PHA target only one or two of these populations?**

**If the answer to the question above is “yes”, then on page 20 of the NOFA under 5.Section D, does the PHA only answer those questions that related to the target population in their application?**

Applications will be evaluated based on the Rating Factors described in the Review Criteria section of the NOFA. The narrative provided under Section D of the HUD-52515 (with prompts on page 20 of the NOFA under #5) will be used to evaluate and score the following criteria:

- Rating Factor 1a. PHA Capacity and Demonstrated Commitment to Provide Housing for Persons with Disabilities
- Rating Factor 1b. Partner Agency Capacity
- Rating Factor 2. Leveraging Resources
- Rating Factor 3. Achieving Results and Program Evaluation

When evaluating PHA and partner capacity, the NOFA was written intentionally to provide points for many different types of experience in providing services and assisting persons with disabilities. These experiences may be helping the targeted population or persons with disabilities more generally. Applicants should describe all relevant experience, not just the experience pertaining to the specific groups they are targeting. Unless the rating criteria specifically mentions a targeted group, the experience may be in assisting persons with disabilities more generally.

The PHA may choose to target one or two of the groups, however, they must comply with the nondiscrimination requirements described in the Nondiscrimination Requirements for Partnerships section of the NOFA (page 17) to ensure persons with specific disabilities are not excluded.

### **6.2. Will PHAs maintain a mainstream wait list separate from the regular HCV wait list?**

No, PHAs must maintain one waiting list for all tenant-based assistance (24 CFR 982.204(f)).

### **6.3. Can a PHA give the mainstream voucher to homeless non-elderly disabled on their waiting list?**

Yes. The PHA must follow its waiting list policies and select eligible families in the order they appear with respect to any applicable preferences. PHAs should be mindful that the eligible population for the vouchers awarded under this NOFA are families that include a non-elderly (age 18-61) person with disabilities. This definition is different than the Non-Elderly Disabled



voucher program which serves families with a head, co-head, or spouse who is a non-elderly person with disabilities.

**6.4. Our waiting list is closed. How can we add eligible applicants?**

The PHA may adopt criteria defining what families apply for assistance when opening its waiting list (24 CFR 982.206(b)(1)). For example, with respect to eligible applicants under the NOFA, if the PHA opens its waiting list for solely these applicants, the PHA must provide public notice that it is opening its waiting list specifically for non-elderly persons with disabilities who are transitioning out of institutional or other segregated settings, at serious risk of institutionalization, homeless, or at risk of becoming homeless. The PHA must have a policy for how families with the same preference will be selected – either in order by the date and time of their application or a random choice technique (24 CFR 982.207(c)). The PHA must comply with the requirements for opening the waiting list under 24 CFR 982.206, including the requirement to provide public notice and to accept applications from families for whom the list is open.

**6.5. Can a PHA implement eligibility screening criteria for Mainstream vouchers that is different than the eligibility screening criteria for the regular HCV program? In other words, can a PHA maintain its current criminal history lookback periods for HCV, but use only the HUD-mandated exclusions (Lifetime registered sex offender and production of methamphetamine in federally assisted housing) in order to provide a program that more closely aligns with Housing First principles for people experiencing homelessness?**

No, there is no special authority to treat families that receive mainstream families differently from other housing choice voucher program applicants and participants.

**6.6. Can we target just the homeless/at risk of becoming homeless? We have a preference on our waiting list for Homeless and one for Disabled already. We have over 600 people on our waiting list for this target area. Our area does not have institutions for folks to transition out of so I am not sure how we would target that area.**

Yes, your PHA may target non-elderly persons with disabilities who are homeless or at risk of becoming homeless. You may establish partnerships with organizations that assist this target population.

**6.7. In lieu of a waitlist, may a PHA use the CoC's Coordinated Entry system to identify and refer applicants for mainstream vouchers?**

All admissions must come from the PHA's tenant-based voucher waiting list. Pages 5 and 6 of [PIH Notice 2013-15](#) provide guidance on how PHAs may establish preferences for homeless individuals being referred through a CoC Coordinated Entry System.

**6.8. May we limit our targeting and administrative plan preference to households with non-elderly, disabled persons who are 1) transitioning out of institutional or other**



**segregated settings; 2) at serious risk of institutionalization; or experiencing chronic homelessness (and exclude non-chronic homeless and at-risk of homelessness)?**

The PHA may receive points under Review Criteria 1d in the NOFA for establishing a preference for one or more of the targeted groups. The first two targeted groups in the question match the groups identified in the NOFA, and a total of 10 points would be awarded to a PHA for establishing a preference for one or both of these groups. PHAs that implement a preference only for chronic homeless (and none of the other targeted categories) will not receive points. PHAs administering housing choice vouchers always have the option of establishing preferences in accordance with 982.207, and it is at the PHA's discretion to establish a more specific, targeted preference for those experiencing chronic homelessness.

**6.9. Page 28 of the NOFA provides 10 points for an admissions preference for "persons with disabilities who are .....or at risk of becoming homeless." If a PHA adopts this admissions preference, can it be "capped" to only apply to the number of vouchers or funding provided under this award? Or does the preference need to apply to all vouchers issued after the date of the administrative plan change?**

24 CFR 982.207(a)(3) allows PHAs to set a limit to the number of applicants that may qualify for a local preference. HUD expects PHAs that claim points under the NOFA will establish a preference for at least the number of vouchers awarded to the PHA under this competition.

**6.10. If we target the four populations covered in the NOFA and we them in the admin plan as a preference. However by the time of distributing the 2017 mainstream vouchers we will only have NED families. Will we be in compliance to distribute these vouchers to families that include a non-elderly disabled person with disabilities?**

HUD expects PHAs that claim points under the NOFA will establish a preference will work with their partner agency or agencies to add qualified applicants that meet the preference criteria to their waiting list. If after making good faith efforts to add families that meet the preference criteria to the waiting list, the PHA is unable to find families who qualify, the PHA may issue the mainstream vouchers to eligible families that with a non-elderly disabled household member who do not meet the preference criteria.

**6.11. Can a PHA set aside a specific number of vouchers for each category? Example: PHA receives 150 Mainstream vouchers: can the PHA set- aside 50 to each category?**

24 CFR 982.207(a)(3) allows PHAs to set a limit to the number of applicants that may qualify for a local preference. HUD expects PHAs that claim points under the NOFA will establish a preference for at least the number of vouchers awarded to the PHA under this competition.

**6.12. Can a PHA prioritize/rank and serve the groups in a specific order?**

**1<sup>st</sup>: NED persons who are transitioning out of institutional and other segregated settings, or at serious risk of institutionalization (the PHA has HUD approval due to**





**remedial action to restrict vouchers to those referred or approved by a single state and to persons with specific disabilities (Intellectual or developmental disabilities)**

**2<sup>nd</sup>: NED persons who are severely mentally ill (does this require approval from Fair Housing and HUD if we are targeting at this specific disability?)**

**3<sup>rd</sup>: NED persons who are homeless or at risk of becoming homeless**

**OR ...**

**Are all three categories equal with no priority or ranking---vouchers are provided to first come first serve no matter which "definition" (1<sup>st</sup>-2<sup>nd</sup>-3<sup>rd</sup>) the applicant meets?**

There are two questions to address for each of these preferences: 1) whether adopting the preference would make the PHA eligible to receive points under NOFA review criteria 1d; and 2) whether the preference is allowable under the regulations of the voucher program and in compliance with fair housing requirements.

In order to receive points under 1d, the PHA must adopt at least one preference exactly as stated in the NOFA. The 1<sup>st</sup> preference listed would not qualify for points if it was limited to those with specific disabilities. HUD does not know whether or how the PHA received approval to adopt this disability-specific preference, but, under certain circumstances, HUD grants "Olmstead waivers" that cover situations like the one described. The 2<sup>nd</sup> preference would not qualify for points under 1d since it is more specific than the preference described in the NOFA. As described, the preference would violate the regulatory prohibition on adopting preferences for persons with a specific disability. The 3<sup>rd</sup> preference is exactly as described in the NOFA and the PHA would be eligible to receive 10 points for adopting this preference.

The main rules for adopting and implementing preferences are governed by the regulations at 24 CFR 982.207 (although PHAs should be familiar with 24 CFR 982 subpart E generally). PHAs must follow these rules as they would for any other tenant-based assistance administered under Part 982.

**6.13. My agency has a waiting list (WL) that has been closed since 2001. We have over 2,000 households remaining on the WL, sorted by the various preference points determined back in 2001. My understanding of this NOFA is that we must advertise and re-open the WL for the purpose of receiving eligible applicants related to this NOFA. This would result in a resorting of our WL with this new preference. If we receive 40 new Mainstream vouchers and contract them up, but still have 10 people on the newly resorted WL claiming this preference, are we obligated to offer the next regular HCV to these households, even though we have no Mainstream vouchers left? Or are they only eligible for the next Mainstream voucher, meaning we can offer the regular voucher to the next person on our original WL? Original applicants on the WL will be upset if a regular voucher is given to this new preference. Please advise.**



The PHA is not required to establish a preference. The preference is only required in order to get points for rating factor 1d. PHAs may limit the number of people that qualify for any particular preference in accordance with 982.207.

**6.14. Our HCV waitlist is currently 3-5 years long. We can add qualified people to the HCV waiting list but they may not get pulled for several years because they will be at the bottom of the waitlist, which means we will not be able to lease-up any mainstream vouchers in the first year if we relied on that process.**

The PHA does not need to wait to issue a special purpose voucher until a qualified family comes to the top of the waiting list. When a special purpose voucher is available, the PHA pulls the first family from the waiting list that meets the eligibility criteria of the special purpose voucher.

**6.15. Under PIH Notice 2013-15 regarding serving homeless households, it appears that we can adopt a homeless preference or a limited homeless preference and leave that preference open at all times, thereby serving homeless households quickly. From HUD's perspective, if we adopt a homeless preference and leave that preference open, are we essentially moving homeless families to the top of our HCV waitlist or are we maintaining a separate homeless waitlist?**

PHAs must maintain one waiting list for HCV assistance (24 CFR 982.204(f)). PHAs may use preferences that allow families that meet certain criteria to move up the waiting list (24 CFR 982.207).

**6.16. How do we balance this preference with all our other preferences we already have to figure out what preference or combination of preferences move someone to the top of the waiting list?**

The PHA's administrative plan must include its criteria and policy for awarding preferences. PHAs must administer preferences in accordance with 24 CFR 982.207.

**6.17. Are those households who don't receive vouchers from this NOFA put on the regular waiting list?**

In order to receive a mainstream voucher, the household would need to be on the PHA's regular HCV program waiting list. PHAs must maintain a single waiting list for all tenant-based voucher assistance (24 CFR 982.204(f)).

**6.18. We have researched and cannot find the answer as to whether or not we can offer these vouchers to applicants who are on our Homeless Limited Preference Wait List. These are applicants who have been referred to us by partnering homeless service agencies. In looking at how other PHA's were using the mainstream vouchers, it appeared that they were offering them to applicants from their regular HCV waitlists if they met the mainstream criteria at the time their name came up for a voucher.**

PHAs must maintain one waiting list for HCV assistance (24 CFR 982.204(f)). PHAs may use preferences that allow families that meet certain criteria to move up the waiting list (24 CFR



982.207). Please refer to pages 5 and 6 of [PIH Notice 2013-15](#) for guidance on how PHAs may establish preferences for homeless individuals being referred through a CoC Coordinated Entry System.

**6.19. Page 21 describes the certification to be submitted. Page 28 says this certification statement is worth 10 points. It is unclear whether the PHA must give a preference to all 4 categories to get these 10 points. If we choose to give a preference to homeless families with a non-elderly disabled family member, are we eligible for the 10 points or some amount less than the 10 points? In reviewing the detail listed on page 28, it seems that the maximum 30 points are still possible even if we give a preference just to 1 of the 4 categories: homeless families with a non-elderly disabled person.**

Ten points will be granted if a preference for any one of the four categories is implemented.

**6.20. Do we have to open our waiting list to be in compliance with the NOFA or if we currently have enough families/individuals on our existing waiting list who meet the NOFA criteria and who have applied directly to us, can we use our existing waiting list until we need to open the waiting list?**

There is no requirement to open the waiting list. Waiting list administration is up to the PHA. If the PHA claims points for implementing a preference, HUD expects that the PHA will either confirm there are eligible families on the waiting list or open the waiting list to receive applications for those that meet the preference category claimed.

**6.21. Admissions Preference- Please confirm whether or not PHAs are being asked to establish this admissions preference for the Mainstream Voucher Program ONLY and not for the voucher program as a whole.**

The admissions preference cannot apply only to certain vouchers, however, PHAs have the ability to limit the number of applicants that may qualify for a particular preference. Please see other questions and answers on this topic above.

**6.22. Can a PHA implement a preference for households with children so long as the household has a non-elderly member with disabilities?**

This type of admission preference may be permitted but would not be eligible for additional points under this NOFA because it is different than the preferences outlined in the NOFA. This NOFA awards funding for vouchers to assist non-elderly persons with disabilities and their families. While not a requirement to receive funding, HUD will award additional points under the NOFA if the PHA targets funds by implementing a preference to assist non-elderly persons with disabilities who are transitioning from institutional or other segregated settings, at serious risk of institutionalization, homeless, or at risk of homelessness. These households may include children.



If a PHA is considering implementing an admission preference for households with children in this program, the PHA should first ensure that the preference is consistent with Federal civil rights laws and requirements. The preference cannot discriminate because of a Federally protected characteristic, including race, color or national origin. PHAs with questions about appropriate preferences in this program or more generally may also contact their local FHEO office.

## 7. Mainstream Voucher Administration

### **7.1. Will these be like other housing choice vouchers? Will they use the HUD-50058?**

Yes, mainstream voucher assistance will be administered like other housing choice vouchers. PHAs will use the HUD-50058 to submit tenant information to PIC.

### **7.2. As a PHA, do we use the definition of disability found in 24 CFR Part 5 subpart D 5.403? This is the definition that we use in the Section 8 Housing Choice Voucher program.**

The definition of disability for purposes of program eligibility is the same used in the Section 8 Housing Choice Voucher program.

### **7.3. Please clarify for purposes of determining eligibility: A person 18 years of age or older and less than 62 years of age and who has a disability, as defined in 42 U.S.C.423?**

This refers to the first category of people considered to have a disability under the definition of “non-elderly person with disabilities” provided in the NOFA. Please see [42 U.S.C. 423\(d\) “Disability” defined](#) for the definition of disability under this section.

### **7.4. Will there be a deadline for when the awarded mainstream vouchers must be leased up?**

There is not an official deadline, however, HUD expects that PHAs will make every effort to utilize at least 80% of the vouchers within the first year. If the PHA does not maintain a leasing rate of at least 80%, HUD may recapture and reallocate the funding. PHAs should consider their capacity to lease-up these vouchers when setting the minimum and maximum vouchers requested in their application. Additional vouchers will be available through future NOFAs, and a poor leasing rate could negatively affect a PHAs chances of being awarded future allocations.

### **7.5. Will mainstream vouchers use the same payment standards as regular housing choice vouchers in our PHAs jurisdiction? What if our PHA is using Small Area FMRs?**

Yes, the same payment standards apply to mainstream vouchers as regular housing choice vouchers. If the PHA is using SAFMRs, then those would apply to mainstream vouchers as well. Persons with disabilities may be eligible to receive a reasonable accommodation for an exception payment standard if they are not able to find an affordable unit that meets their



needs. Exception payment standards are granted on a case-by-case basis and must be approved by HUD and the PHA.

**7.6. Is there a requirement for the (811) Mainstream Vouchers to be utilized at 80% within the first year?**

On page 17 of the NOFA, under "Reallocation of Funds", HUD reserves the right to recapture and reallocate funding if the PHA does not comply with the terms of the NOFA or maintain an 80% leasing rate.

**7.7. It says on page 9 from the NOFA that one of the definitions of being at risk of becoming homeless is if the family lives in a larger housing unit in which there reside more than 1.5 people per room, as defined by the U.S. Census Bureau. Do we include the rooms not for sleeping (i.e. kitchen) in this formula?**

Rooms that are not for sleeping are included in this definition. The U.S. Census defines a room as "Rooms include living rooms, dining rooms, kitchens, bedrooms, finished recreation rooms, enclosed porches suitable for year-round use, and lodgers rooms."

You can find the definition here: [https://www.census.gov/glossary/#term\\_Rooms](https://www.census.gov/glossary/#term_Rooms)

Here's a document about measuring overcrowding exploring the various definitions published by the Census Bureau:

[https://www.census.gov/programs-surveys/ahs/research/publications/Measuring\\_Overcrowding\\_in\\_Hsg.html](https://www.census.gov/programs-surveys/ahs/research/publications/Measuring_Overcrowding_in_Hsg.html)

**7.8. Mainstream vouchers awarded under a previous NOFA, are those vouchers now subject to the new eligibility requirements outlined in the current NOFA?**

No. This NOFA does not change the eligibility criteria of previously awarded vouchers. Turnover requirements for existing mainstream assistance will be addressed in a PIH Notice.

**7.9. Are Mainstream vouchers awarded in a previous NOFA counted in the baseline along with those awarded through this NOFA? For example, if a PHA currently administers 50 Mainstream vouchers that are 100% utilized, and is then awarded another 50 through this NOFA, is the PHA's utilization rate 0/50 on day one, or is it 50/100 on day one?**

The PHA's overall utilization rate of mainstream voucher assistance will be based on its total baseline, including those already awarded.

**7.10. Can a PHA use a different Payment Standard amount for Mainstream Vouchers than it does for Section 8 vouchers? For example, S8 vouchers are set at 95% FMR and Mainstream Vouchers are set at 100% FMR?**

No, there is no special authority to provide a different payment standard for mainstream vouchers.



**7.11. Is Mainstream funding classified as “Targeted Funding” under 24 CFR 982.204(e)?**

Yes, PHAs must provide assistance to families that include a non-elderly person with disabilities.

**7.12. Is it possible for individuals or families who are using a bridge voucher to apply for a mainstream voucher? Assuming they meet the other eligibility criteria for the mainstream voucher and are on the waiting list? Many of the bridge vouchers are state or locally funded (i.e., not HUD funded) and usually those using them are required to sign up for waiting lists for any other housing voucher program available (e.g. CoC, PHA). The bridge voucher holder may have been homeless or institutionalized and be at risk of homelessness or further institutionalization if they do not “bridge” to another permanent voucher.**

The eligible population for vouchers awarded under this NOFA are families that include a non-elderly person with disabilities. In order to receive the benefit of a housing choice voucher, including a mainstream voucher, the participant must not be receiving a duplicate subsidy from another state or local program. More information about the prohibition on duplicate subsidies is available at 24 CFR 982.352(c).

**7.13. Can a PHA receive admission preference points in Section V.A.1.d for “move-on” type initiatives that allow formerly homeless individuals move from Permanent Supportive Housing to a Housing Choice Voucher?**

No, PHAs will not receive preference points under this NOFA for a preference for “move-on” type initiatives. Mainstream vouchers may be used to assist these families, however, provided they are a family that includes a non-elderly person with disabilities.

**7.14. On page 17 of the NOFA it states that MTW agencies may administer the MS vouchers under its’ MTW agreement. Can a MTW agency submit the HH information on the MTW Family Report?**

Yes, the MTW Family Report is the HUD-50058 MTW. Mainstream voucher assistance will be administered like other housing choice vouchers. PHAs will use the HUD-50058 (or HUD-50058 MTW) to report tenant information.

## **8. Funding**

**8.1. Are mainstream vouchers funded through the regular HCV HAP budget?**

Existing mainstream 5-year vouchers and the vouchers to be awarded under this NOFA are renewed under a separate line item in the budget.



**8.2. How long will the mainstream voucher funding be funded? The NOFA indicates that \$13 million from 2017 and \$385 million from 2018 are available, but the NOFA is for \$100 million. Is HUD planning on holding these funds in order to fund 4-years-worth of mainstream vouchers?**

HUD will award up to \$100 million through this NOFA. That represents the 2017 funding and up to \$87 million of the 2018 incremental funding. This funding is for one year of voucher assistance, and HUD expects the funding awarded through this NOFA to be renewed annually. HUD will award the rest of 2018 incremental funding through one or more future NOFAs.

**8.3. Does the PHA receive admin fee funding using the same formula we receive admin funding for HCV and our existing mainstream vouchers?**

Yes, admin fees for mainstream vouchers are prorated at the same level as regular housing choice vouchers.

**8.4. Will HAP funds be prorated at the same level as regular housing choice vouchers?**

No, HAP for mainstream vouchers will be fully funded at the inflated CY VMS HAP and leasing cost entered by the PHA.

**8.5. When are the funds anticipated to be available?**

The funds will be available immediately upon award.

**8.6. Is there any assurance that the vouchers will be funded after the project period? If no, what happens to the families after the project period?**

As with any funding, renewal funding for these vouchers is subject to congressional appropriation. In previous years, Congress has consistently provided renewal funding for these vouchers.

**8.7. Will there be another mainstream application round? When will the next round be?**

There is approximately \$300 million in additional funding to be awarded after this round. HUD expects to award this funding through additional NOFAs but the timing of future NOFAs has not yet been determined.

**8.8. Can any of the funding awarded be used to pay for supportive services provided by community organizations the PHA may partner with?**

Funding awarded through this NOFA will fund housing assistance payments (HAP) for eligible mainstream voucher participants, as described in the NOFA, and administrative fees to the PHAs. PHAs may use their administrative fees for qualified expenses.



**8.9. Is compensation for third party facilitation administration allowable, either as part of subcontract or as part of an administrative line item, i.e. for the LLA or CoC in facilitating 811 interagency referral coordination and case-conferencing? Also, what if any expenses for partner organizations are eligible?**

Funding awarded through this NOFA is strictly for housing assistance payments and administrative fees. PHAs may choose to use their administrative fees for referral coordination and case-conferencing.

**8.10. Will a PHA's ACC units be increased when it receives an award of mainstream vouchers?**

Yes. When mainstream awards are made, the PHA's CACC will be amended to include increased budget authority and units. Please note that mainstream vouchers are renewed by Congress separately from other HCV assistance. Even though the PHA has one CACC which includes mainstream assistance, mainstream units are not included in the utilization tool nor are they included in SEMAP.

**8.11. Since the project period is 12 months, I'm assuming that applications should be structured to provide temporary housing assistance to eligible tenants (not to exceed 12 months). Would you please confirm if that is correct or incorrect?**

The initial award amount will cover 12 months, however, HUD expects the funding will be renewed annually by Congress as is the practice for the HCV program as a whole.

**8.12. How do we estimate the amount of funding we are requesting on the SF-424?**

The initial award amount will be based on the estimated HAP expenses necessary for one full year. The PHA may estimate their funding needs by determining the inflated HAP amount (based on VMS) needed to fund a 2-bedroom unit for 12 months multiplied by the number of vouchers they would like to be awarded.