



**U. S. Department of Housing and Urban Development
Office of Public and Indian Housing**

**Frequently Asked Questions about PIH Notice 2018-17: Request for Letters of Interest and Applications under the Moving to Work Demonstration Program for Fiscal Year 2019:
COHORT #1 – Overall Impact of Moving to Work Flexibility**

UPDATED November 4, 2020

Background

This document contains a listing of questions regarding PIH Notice 2018-17 (HA), issued on October 11, 2018, and the related PIH Notice 2019-03 (HA), issued on March 14, 2019. The contents of this document will be updated periodically as questions arise that can be addressed by HUD.

Questions that are new for this version are marked with “(NEW)” and shown in green. The footer has been updated to denote the version number and revision date.

For more information on Cohort #1 of the MTW Expansion please visit:

https://www.hud.gov/program_offices/public_indian_housing/programs/ph/mtw/expansion/cohort1
(MTW Cohort #1 Website).

Below are the latest Questions and Answers for Cohort #1 of the MTW Expansion on the second step of the application process.

General

1. How do I know if my PHA should submit a full application to Cohort #1? How do I know if my PHA is in the “Waitlist” category?

Interested PHAs that were found to be eligible after submitting a Letter of Interest to Cohort #1 of the MTW Expansion under PIH Notices 2018-17 and 2019-03 were placed into regional lotteries to determine which would be invited to submit a full application to Cohort #1 and which would be placed in the “Waitlist” category. The results of this lottery were communicated via email to these PHAs in August of 2020. A list is also available on HUD’s Cohort #1 Website. If you have a question as to your specific PHA’s status, please send an inquiry email to: MTWcohort1@hud.gov.

2. How do I know if I was found to be not eligible under Cohort #1?

Interested PHAs that submitted a Letter of Interest to Cohort #1 of the MTW Expansion under PIH Notices 2018-17 and 2019-03 by May 13, 2019, were notified by email of their eligibility status on July 10, 2019. If you have a question as to your specific PHA’s eligibility, please send an inquiry email to: MTWcohort1@hud.gov.

3. How were the regional lotteries conducted?

HUD received Letters of Interest from 43 eligible applicant PHAs for Cohort #1 of the MTW Expansion. Due to the location of the 43 eligible applicant PHAs and how they were disbursed across the five geographic regions described in PIH Notice 2018-17, the target numbers had to be adjusted slightly to ensure a lottery for each of the five geographic regions was possible. The regional lotteries resulted in 33 eligible applicant PHAs that were invited to submit a full application to Cohort #1 and 10 eligible applicant PHAs that were placed in the “Waitlist” category. There are not yet any PHAs in the control group category.

4. What if I have a question not addressed in this document?

Please direct any questions in email to: MTWcohort1@hud.gov.

For Eligible Applicant PHAs in the “Waitlist” Category:

5. My PHA was notified that it is in the “Waitlist” category. When will we know whether we are in the control group (and not receiving MTW designation under Cohort #1) or invited to submit a full application to Cohort #1?

PHAs in the “Waitlist” category will be notified of their final status under Cohort #1 of the MTW Expansion by December 4, 2020. If a PHA in the “Waitlist” category is notified that it will be in the control group (and not receiving MTW designation under Cohort #1), it will have the time and opportunity to apply to Cohorts #3, #4 and #5 of the MTW Expansion. If a PHA in the “Waitlist” category is invited to submit a full application to Cohort #1, that PHA will have at least three months from when the notification occurred to submit that full application.

For Eligible Applicant PHAs invited to submit a full application:

6. What is included in a “full application” to Cohort #1 of the MTW Expansion?

A “full application” to Cohort #1 of the MTW Expansion is the MTW Plan and application described in second step of the application process in PIH Notice 2018-17. Full instructions and elements of the MTW Plan and application for the second step are on pages 11-16 of PIH Notice 2018-17.

7. In light of COVID-19, must the PHA still conduct the two public meetings and public hearing as described on page 12 of PIH Notice 2018-17?

PHAs are permitted to hold such meetings remotely or online provided they can accept and post answers to questions submitted during the meeting. In selecting a streaming service, PHAs must ensure they can comply with Section 504 of the Americans with Disability Act. PHAs that continue with public hearings/meetings in-person should follow the latest CDC, state, and/or local health department guidance.

8. With limited ability for face-to-face contact, resident, participant and community engagement is a challenge. Are there other ways to conduct robust public engagement?

HUD recommends that PHAs develop a process that includes various forms of alternative communication methods so that all residents/participants/the community can receive information and participate in the process regardless of their individual circumstances. Below are some suggested methods by which to share information:

- Set up teleconference calls in the place of in-person meetings, ensuring that residents/participants/the community have enough prior notice and receive clear directions (particularly those with limited technological access/abilities).
- Provide flyers/notices to residents/participants where they live with updates about how information can be obtained regarding the PHA's interest in the MTW demonstration program.
- Post notices in common areas of properties.
- Provide letter updates in mailboxes.
- Provide text and/or email updates.
- Share a sign-up sheet with residents/participants to meet 1-on-1 with office staff or by phone.
- Create online materials (video or other) available to all.
- Create and distribute a survey to gather information about questions, experience, and preferences.
- Ensure that all residents/participants have contact information (phone and email) for PHA staff should they have questions.

9. Full applications are due to HUD by December 4, 2020. Will my PHA have time enough time?

HUD has designed the application window to be long enough for PHAs to conduct meaningful public engagement and complete the MTW Plan and application for Cohort #1. A sample timeline of how a PHA might organize time in the application window is provided on the MTW Cohort #1 Website.

10. Where can I find blank copies of the standard forms needed for Appendix 3 (HUD-2991, HUD-50071 and SF-LLL)?

Links to blank versions of these forms are available on the MTW Cohort #1 Website.

11. If we submit the MTW Plan and application for Cohort #1 by the deadline, or even earlier, will we be able to immediately implement some parts of our program on January 1, 2021?

After submitting the MTW Plan and application by December 4th, HUD will review it for completeness. If all elements are complete, HUD will likely notify the PHA by January of 2021. At that point, your PHA would need to execute the MTW Amendment to the ACC and send that back to HUD. HUD would then counter-sign this document. Once counter-signed, it would be sent back to you and the counter-signature date would be your "MTW entry" date. At that point your PHA would officially be "MTW" and your PHA could immediately begin using funds flexibly (that is, using HCV and public housing funds for eligible uses across HCV and public housing programs).

As for the MTW waivers/activities in Appendix I of the MTW Operations Notice, your PHA cannot implement any of these until you complete the MTW Supplement to the PHA Plan, submit it to HUD and have it approved. The timing of this is largely dependent on how long your PHA takes to submit the MTW Supplement. For more information on the MTW Supplement to the PHA Plan and the associated public process and HUD review, please go to the MTW Expansion section of the MTW website (www.hud.gov/mtw). You can also find information in the interactive training (<https://www.hudexchange.info/programs/mtw/>). This should give you an idea of how long your PHA may need to complete the MTW Supplement.

12. Please provide more clarification on the "15 day" requirement for the Board approval (that is, that the board resolution must be signed no less than 15 days after the public hearing). Is

there any requirement on when the public hearing must be held during the public comment window (should it be at the beginning or at the end)?

To give an example, if the public hearing was held on October 10th, the Board approval would need to be on October 25th or later (assuming the public comment period had already closed). The Board approval should occur after, not during, the public comment window.

There are many different ways to schedule these requirements to provide flexibility with the existing processes of your local community. For example, say, the public comment period runs from October 1st through October 30th and the public hearing is on October 10th, the soonest the Board could provide approval would be October 31st. If the public comment period runs from October 1st through October 30th and the public hearing is on October 20th, the soonest the Board could provide approval would be November 4th.

13. How many days must we advertise before the public hearing? What format should this advertisement be in?

The PHA must adhere to the specific public process requirements on page 12 of PIH Notice 2018-17. A specific number of advertisement days or format is not required. PHA's should provide reasonable notice in a method that will best reach its residents/participants and community. PHA's should consider the PHA plan regulations for similar requirements at 24 CFR 903.17 which provide 45-day notice.

14. For the *Proposed Use of MTW Funds* section, is there a statement that we should ensure we include in this section to request MTW funding flexibility?

The language to request MTW funding flexibility is in PIH Notice 2018-17 in section 5(A)(ii)(e). To put simply, the PHA should state "X PHA requests authority to use public housing and HCV funds flexibly" in the MTW program.

15. When submitting our MTW Plan and application to Cohort #1 do we use the Template - MTW Supplement to the Annual PHA Plan?

No. The PHA does not need to submit the MTW Supplement at this time. The PHA should submit only the materials specified on pages 11-15 of PIH Notice 2018-17. This includes a 10-page narrative that responds to the questions on pages 13-14 and the four appendices.

16. Is the notification of the PHA's intent to participate in MTW separate from the notification of the resident meetings? Or must they be the same notice?

The notification to participate in MTW and the two resident/participant meetings are distinct requirements. That is, there must be at least one notification to participate in MTW and two resident/participant meetings. The PHA should provide notice of and advertise the resident/participant meetings. The PHA may do this by providing the dates of the resident/participant meetings in the notification to participate in MTW, in other ways or do both. Please note, the two resident/participant meetings are separate from the required public hearing.

17. Can MTW activities be applied to both PBV and PBRA RAD units?

No. PBRA units are not included in the MTW program. No MTW flexibility may be extended to PBRA units whether they are PBRA RAD units or not. MTW flexibility may be applied to PBV units as described in the MTW Operations Notice. If PBV units are PBV RAD units, then the PHA

must also follow the requirements of the RRAD Notice, which may expressly limit which MTW flexibilities and/or activities that can be applied to an MTW PHA's PBV RAD units.

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

Yes.

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

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

20. (NEW) I have a question on whether MTW funds can be used for a specific purpose.

For programmatic questions on the MTW Expansion, including the use of MTW funds, please refer to the MTW Operations Notice. The MTW Operations Notice and associated guidance and training are available at:

https://www.hud.gov/program_offices/public_indian_housing/programs/ph/mtw/expansion.

21. (NEW) Do the format requirements for Part I of the MTW Plan and application apply if I put the text in a table?

The format requirements for Part I of the Cohort #1 MTW Plan and application are given in PIH Notice 2018-17 (pages 11-12). These format requirements apply to any text in Part I of the Cohort #1 MTW Plan and application, including text in a table. If, for example, an applicant provided a table or other text in Part I that was not in Times New Roman 12-point font, the page that the table and/or text was on would count as two pages.

A table or other information that does not meet the format requirements for Part I of the Cohort #1 MTW Plan and application could be provided in Appendix 4 on "Other Supporting Documentation." Appendix 4 is limited to 10 pages with page numbers, but there are no other specific format requirements.

Please note, applicants should strive to respond to all of the Part I sections in PIH Notice 2018-17 (pages 13-15) in Part I of their MTW Plan and application. To the extent that information is provided in Appendix 4 that relates back to a section of Part I, it is helpful to state that in the Part I narrative and refer the reader to the specific part of Appendix 4.

22. (NEW) Must the page numbering in Part I and Appendix 4 start over for each, or could they be sequential?

The requirements in PIH Notice 2018-17 (pages 11-12) state only that pages in Part I and Appendix 4 must contain page numbers. Whether they are numbered individually or sequentially is at the applicant's discretion.

23. (NEW) Should the MTW Plan and application cover one or two years?

The MTW Plan and application overall does not cover a specific amount of time. Where a specific time period should be considered for an individual section or question, this will be directly stated. For example, the section on “Specific Dates and Milestones for the MTW PHAs Local MTW Program” (Section 5(A)(ii)(g) of PIH 2018-17 on pages 14-15) requests that the applicant provide a schedule “through the first two years of MTW participation.”

24. (NEW) Despite outreach, our PHA has not had high levels of public participation in the past. Will the PHA be penalized for low turnout if it took reasonable efforts to engage the community and stakeholders?

The applicant PHA will be assessed only on the specific public process requirements listed on page 12 of PIH Notice 2018-17. These requirements do not include a number of participants or level of participation.

25. (NEW) Is there additional funding available for PHAs for printing, postage and other costs as a part of this application process?

No. There is no additional funding available to PHAs in putting together an MTW Plan and application package.