



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

**Frequently Asked Questions about PIH Notice 2020-21: Request for Applications under the Moving to Work Demonstration Program for Fiscal Year 2020:
COHORT #2 – Rent Reform**

UPDATED November 4, 2020

Background

This document contains a listing of questions regarding PIH Notice 2020-21 (HA). 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 #2 of the MTW Expansion please visit:

https://www.hud.gov/program_offices/public_indian_housing/programs/ph/mtw/expansion/cohort2 (MTW Cohort #2 Website).

General

1. How do I know if my PHA is eligible to submit an application to Cohort #2 under this notice?

PHAs that submitted a Letter of Interest to Cohort #2 of the MTW Expansion under PIH Notice 2019-04 by the deadline of June 12, 2019, were notified of their eligibility status no later than December 6, 2019. A list of eligible PHAs is also available on HUD’s Cohort #2 Website. If you have a question as to your specific PHA’s status, please send an inquiry email to: MTWcohort2@hud.gov.

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

PHAs that submitted a Letter of Interest to Cohort #2 of the MTW Expansion under PIH Notice 2019-04 by the deadline of June 12, 2019, were notified of their eligibility status no later than December 6, 2019. If you have a question as to your specific PHA’s eligibility, please send an inquiry email to: MTWcohort2@hud.gov.

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

Please direct any questions in email to: MTWcohort2@hud.gov.

For Eligible Applicant PHAs:

4. May a PHA willing to implement any of the test rents detailed in the Cohort #2 Request for Applications submit an application for multiple test rents?

No. Applicant PHAs must select only ONE test rent to implement and provide information on only that test rent.

5. In light of COVID-19, must the PHA still conduct the two public meetings and public hearing as described on pages 9-10 of the Cohort #2 Request for Applications?

Public hearings/meetings required as part of the Cohort #2 Request for Applications must still occur. 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.

6. 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.

7. Full applications are due to HUD by January 8, 2021. 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 #2. A sample timeline of how a PHA might organize time in the application window is provided on the MTW Cohort #2 Website.

8. 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 #2 Website.

9. 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.

10. 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 pages 9-10 of PIH Notice 2020-21. 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.

11. 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 2020-21 in section 4(C)(ii)(a)(V). To put simply, the PHA should state "X PHA requests authority to use public housing and HCV funds flexibly" in the MTW program.

12. (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 10-15 of PIH Notice 2020-21. This includes a narrative section (including the up to 15 page MTW Plan section and the rent reform section) that responds to the questions on pages 10-14 and the four appendices.

13. 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.

14. Can MTW activities work in 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.

15. I have a specific question about how one of the MTW test rent policies will apply to a specific situation at my PHA that is not address in PIH Notice 2020-21 or in this FAQ.

Some implementation details of the MTW test rent policies will not be known until the PHA's chosen MTW test rent is actually applied to the PHA's residents/participants. HUD and the independent research team will work with the PHA on these implementation details if it is chosen to participate in Cohort #2 of the MTW Expansion. If the PHA anticipates an unknown implementation detail that it believes is significant, please include it in the MTW plan and application package.

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

Yes.

17. 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.

18. (NEW) Are households that the Selection Notice lists as “excluded” (elderly, disabled, Special Purpose Voucher, etc.) included in the evaluation in the control group? Can the PHA choose to include these excluded households in the evaluation?

No. Households listed on page 5 of PIH Notice 2020-21 as “excluded” will not be in the control group. They will be fully excluded from the evaluation. The MTW PHA may not elect to include any excluded households in the evaluation.

19. (NEW) Can the MTW PHA apply MTW waivers/activities to excluded households?

The MTW PHA may apply MTW waivers/activities to excluded households in accordance with the MTW Operations Notice.

20. (NEW) Can the MTW PHA apply other non-rent calculation related MTW waivers/activities to all residents/participants (treatment group, control group and excluded group)?

PIH Notice 2020-21 provides a list of MTW waivers/activities that are not available to Cohort #2 MTW PHAs during the evaluation on pages 6-7. MTW waivers/activities not discussed there may be implemented by the MTW PHA in accordance with the MTW Operations Notice.

21. (NEW) Can the MTW PHA request that one of the restricted MTW waivers/activities listed be approved in the MTW Plan and application to Cohort #2?

No. PIH Notice 2020-21 provides a list of MTW waivers/activities that are not available to Cohort #2 MTW PHAs during the evaluation on pages 6-7. Once a PHA is selected to participate in Cohort #2 of the MTW Expansion, the PHA would work with HUD and the independent research team to assess this possibility. The PHA may describe the intention to pursue this in the MTW Plan and application.

22. (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.