



**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 DECEMBER 4, 2018

Background

This document contains a listing of questions regarding PIH Notice 2018-17 (HA), issued on October 11, 2018. The contents of this document will be updated periodically, as questions arise that can be addressed by HUD. Additional questions and answers will be added sequentially to the end of the document as they become available. The footer will be updated to denote the updated version number and revision date. If you are applying under this Notice, please check back for updates prior to the submission deadline of January 11, 2019.

For more information on the requirements for applying to the MTW Demonstration please review the full Notice at: www.hud.gov/mtw.

1. What are the requirements for public housing agencies (PHAs) applying for the MTW demonstration under this Notice? Must applicant PHAs meet all of the requirements? Is there a way to obtain an exception to one or more of the requirements?

Section 239 of the Fiscal Year 2016 Appropriations Act, P.L. 114-113 (2016 MTW Expansion Statute) requires that applicant PHAs be designated as a High Performing agency under either the Public Housing Assessment System (PHAS) OR the Section Eight Management Assessment System (SEMAP). For this first cohort, applicant PHAs must also administer 1,000 or fewer aggregate public housing and housing choice voucher (HCV) units. Additional eligibility criteria established by HUD can be found in the Notice on pages 8-11. PHAs applying for the MTW demonstration under this Notice must meet all of the eligibility requirements. Exceptions to one or more of the requirements will not be available.

2. To be eligible, does an applicant PHA need to administer BOTH public housing and HCV units?

No. To be eligible, the applicant PHA must have 1,000 or fewer aggregate public housing and HCV units, but these may be in either or both of the public housing and/or voucher programs.

3. Is an applicant PHA that previously had in excess of 1,000 units, but now administers less than 1,000 units, eligible? How will the number of units be calculated?

As stated on page 8 of the Notice, HUD will determine applicant eligibility as of the letter of interest submission deadline date provided in Section 4(C) of the Notice (found on page 11 of the Notice). Applicants must then meet all of the eligibility requirements as of January 11, 2019. Therefore, any inventory calculation made prior to that date would not be factored into an eligibility determination.

To determine eligibility, applicants should calculate the current combined number of HCVs under contract pursuant to an Annual Contributions Contract (ACC) (including special purpose vouchers) and public housing units under an ACC in the federal public housing program and estimate any future changes to this number that would occur before January 11, 2019.

4. Will HUD offer future rounds requesting applications for entry to the MTW demonstration under different eligibility requirements? What will prompt future rounds?

Per the 2016 Expansion Statute, HUD must add 100 additional PHAs to the MTW demonstration over seven years. These 100 additional PHAs will be selected by cohort to evaluate specific policies. Therefore, HUD will publish future selection notices seeking applications for those cohorts. For more information on the MTW Expansion as a whole, please refer to the MTW Expansion FAQ page at:

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

5. Are PHAs required to utilize public housing and HCV funds (Section 8 and 9 funds) flexibly under the MTW demonstration program?

No. PHAs applying to join the MTW demonstration must, however, request the authority to use public housing and HCV funds flexibly. Section 5(A)(ii)(e) (page 14 of the Notice) says that PHAs must request this. If the applicant PHA does not plan to use funds flexibly, the PHA should still request the authority to do so, but note this in the response to this item in the application and explain why.

Requesting authority to use public housing and HCV funds flexibly is required by Section 204 of the Omnibus Consolidated Rescissions and Appropriations Act of 1996, P.L. 104-134; 42 U.S.C. 1437f note (1996 MTW Statute), but it is up to the MTW PHA whether and how this flexibility is ultimately implemented.

6. Does HUD prefer applicants to submit a hard copy or digital copy of the application?

Applicants should follow the submission information on pages 7-8 and page 11 of the Notice.

7. What are the size limitations of HUD's email system for receiving attachments?

HUD's email system cannot receive attachments larger than 12 megabytes in total size and a PHA's email provider may have lower size limits. Also, when email volume is high, emails over 5 megabytes in size may be temporarily housed on HUD's server and not transmitted to an email address until after normal business hours. PHAs should send emails early to ensure that the application is in fact received on time. HUD will not accept late applications, as stated in the Notice.

8. How can a PHA confirm that the email transmittal of the application has been received by HUD?

PHAs using Microsoft Outlook as their email client can request a "read receipt" prior to sending the email. Additionally, the addressee that transmitted the letter of interest package will receive an email confirming receipt within 72 hours of submission.

9. Can a PHA use Section 8 and/or Section 9 funding to assist with costs in putting together materials under this Notice?

HUD has greatly streamlined the application process for MTW designation. This Notice requires only a two-page letter of interest (with attachments) followed by a ten-page narrative MTW Plan and application (with attachments). Therefore, it is anticipated that significant resources will not be needed to apply under this Notice. If resources are required, expenses would be allowable from public housing operating funds, HCV administrative fees and/or HCV administrative fee reserves. Any expenses would be subject to reasonable cost requirements contained in Part 200.

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

Please direct any questions in email to: mtw-info@hud.gov.

11. If an agency is selected in the first cohort, may they switch to another cohort?

An agency that is selected for MTW designation must remain within the cohort they were selected. If an agency is selected to participate in the first cohort, then the agency must remain in the first cohort. An agency

designated as an MTW agency may at any time choose to end their participation in the MTW Demonstration Program.

12. Is there a minimum number of units an agency must have to submit a letter of interest for cohort #1?

An agency that has between 1-1000 units of aggregate public housing and/or HCV units may apply for designation under Notice PIH 2018-17.

13. My agency is authorized to have up to 900 ACC units, but we are administering 300 ports. Is my agency eligible for the first cohort?

Yes, only the authorized public housing and HCV units are counted towards the aggregate amount (1-1000 units for the first cohort). This includes any special purpose vouchers.

14. My agency is an HCV only agency. What are the benefits of MTW for my agency?

MTW offers many benefits to voucher only agencies including agencies that have done a portfolio-wide conversion to RAD. For instance, voucher only agencies have the ability to apply eligible activities within the MTW Waivers to vouchers and use Section 8 funding flexibly to develop affordable housing.

15. Will my agency receive additional funding if we are selected for MTW designation?

No. Agencies that receive MTW designation continue to receive public housing and/or HCV funding in accordance with appropriations act and program requirements and do not receive any additional funding as a result of participation in the MTW demonstration.

16. When will HUD accept applications for Cohorts 2, 3, and 4?

HUD anticipates inviting agencies to apply to Cohort #2 in the spring of 2019 and designate the selected agencies later in 2019. HUD anticipates designating all cohorts by 2020.

17. What policies will be tested in Cohorts 2, 3 and 4?

The following table show the policies that will be tested for the MTW Cohorts along with the research method.

<u>Policy to Test</u>	<u>Research Method</u>
Cohort #1: MTW Flexibility	Randomly select 30 PHAs from applicants under 1,000 combined units; Compare to the PHAs that were not selected.
Cohort #2: Rent Reform	Random assignment within PHA.
Cohort #3: Work Requirements	Refining evaluation method per the October 18, 2018 FACA call.
Cohort #4: Landlord Incentives	Pending discussions with FACA.

18. Can an MTW agency have an FSS program?

MTW agencies are allowed to have an FSS program.

19. The Cohort #1 Baseline Survey references an Appendix A, but I do not see an Appendix A to the MTW Operations Notice. Can you direct me to where I can find Appendix A?

The “Appendix A” reference in the PHA Baseline Survey should just reference “the Appendix of the MTW Expansion Notice.” There is no “Appendix A” and we are working with our programmers to fix this error.

20. What is HUD hoping to learn from the evaluation of the first cohort of the MTW expansion?

The evaluation of this first MTW cohort of small PHAs will focus on how newly authorized MTW PHAs use the flexibility offered through the MTW designation *and* what the consequences of that flexibility are for housing authorities’ operations and tenants. The evaluation of Cohort 1 will not seek to assess the impact of any single policy change but will instead consider the overall impact of a PHA being granted access to the full package of flexibilities that are the hallmark of MTW designation. HUD is interested in learning about what policy changes small PHAs choose to make with their MTW flexibility, the effects of these policy changes on PHA operations and costs and for the residents it serves, and how these compare to standard operating procedures at other small PHAs that do not receive MTW designation.

21. The Selection Notice references a “treatment group” and a “control group” for the evaluation. What is the difference between these two groups?

The “treatment group” will consist of the 30 PHAs that are randomly selected to receive the MTW designation through the selection process described in the Notice PIH-2018-17. The “control group” will consist of the PHAs that apply for the MTW designation but that are *not* randomly selected to receive the MTW designation through the selection process described in the Notice. HUD will also select some PHAs that apply to receive MTW designation into a third “waitlist group” of PHAs that could be invited to apply to the first cohort if a PHA selected for the treatment group chooses to withdraw from selection consideration. Waitlist group PHAs that are not selected for the treatment group will be considered part of the control group.

22. Could my PHA be identified through the evaluation as either a member of the treatment group or the control group?

HUD is planning to announce the 30-treatment group PHAs that receive the MTW designation publicly when the selection process described in the Notice is complete. HUD is not planning to publicly announce the control group, although control group PHAs may be identifiable in future evaluation reports. The evaluation will *not* present any outcomes for individual PHAs, however. Instead, the evaluation will present aggregate findings across *all* of the PHAs in the treatment group and *all* of the PHAs in the control group. No outcomes will be presented at the individual PHA level, so no PHA, treatment or control, will be identified for its individual outcomes.

23. The Selection Notice and Attachment 1 to the Selection Notice state that all PHAs must participate in the HUD-sponsored evaluation of the first cohort of the MTW Expansion whether or not it receives an MTW designation through the lottery process described in PIH Notice 2018-17. What will participation mean for the treatment group? What will participation mean for the control group?

All PHAs who apply for MTW designation in the first cohort of the MTW expansion will be required to participate in the HUD-sponsored evaluation regardless of whether the PHA receives MTW designation through the lottery process. The data collection burden for PHAs in the control group will be modest, and HUD will not request PHAs to resubmit information that has already been submitted to HUD.

PHAs in both the treatment and control groups must cooperate fully with HUD and its contractors for the duration of the evaluation and will be required to provide information about their housing authority and the residents when requested by HUD and its contracted evaluators. Data collection is expected to begin in the fall of 2020 and will conclude in 2022.

In addition to data obtained directly from HUD and from publicly available data, the evaluators may also collect information directly from participating PHAs through various means including telephone interviews and online surveys. The purpose of the surveys and interviews are to supplement and confirm data previously submitted to HUD and to collect new data that is critical to the evaluation and would not otherwise be available to evaluators.

The data collection instruments and burden associated with the study of the first MTW cohort will be reviewed by the Office of Management and Budget (OMB) in accordance with the Paperwork Reduction Act and will be available for public comment in the spring of 2020.

HUD and its contractors plan to hold webinars with participating PHAs throughout the duration of the evaluation to provide updates on the status of the evaluation, describe upcoming data collection activities, and provide an opportunity for participating PHAs to share feedback with the evaluation team. The expected reporting burden for control group PHAs for participating in the evaluation is 8 hours over the three-year data collection period.

24. Will PHAs receive any compensation for participating in the evaluation?

HUD is not able to provide monetary compensation for PHAs participating in the first cohort of the MTW expansion. HUD and its contracted evaluators seek to minimize the data collection and reporting burden of both treatment and control group PHAs. The evaluation will rely on data that PHAs already routinely collect and report to HUD to the greatest extent possible. Any supplemental data that is needed from participating PHAs will be requested in a manner that is simple for the PHAs to understand and to provide the requested data.

The evaluation team may report back individual agency-level results to participating PHAs over the course of the evaluation. (These agency-level results would be provided by the evaluation team directly to each individual PHA and would not be shared more broadly.)

25. How will data obtained from HUD and individual PHAs be used for the evaluation?

The first cohort of the MTW expansion will evaluate the overall effects of MTW flexibility on a PHA and the residents it serves. The evaluation will use data obtained from HUD, from individual PHAs, and from publicly-available datasets to compare outcomes related to the three MTW statutory objectives - cost effectiveness, self-sufficiency and housing choice. Outcome measures will be aggregated and compared between PHAs that receive MTW designation and PHAs assigned to the control group. There will be no PHA-specific reporting of the data for PHAs in either the treatment or the control group in any publicly-released evaluation reports.

26. When will HUD report results from the evaluation of the first cohort?

The evaluation will be conducted between September 2018 and September 2023. The evaluation will produce three evaluation reports. HUD expects to publish these reports in 2021, 2022, and 2023. The first annual report will present results from the first 12 months of MTW implementation for the initial MTW designees and for the control group.