

Moving to Work (MTW) Demonstration Research Advisory Committee (RAC) Meeting October 14th Meeting Read Ahead

The MTW Research Advisory Committee (“the Committee”) was established by the 2016 Appropriations Act that also directed HUD to expand the MTW Demonstration Program (“the MTW Expansion”). The Committee is comprised of representatives from MTW public housing agencies (PHAs), U.S. Department of Housing and Urban Development program and research experts, and independent subject matter experts in housing policy and research. The purpose of the Committee is to advise HUD on specific policy proposals and methods of research and evaluation related to the MTW Expansion. More information about the Committee’s purpose, a list of current Committee members, and meeting materials from prior Committee meetings are all publicly available on HUD’s website.¹

The purpose of the upcoming Committee meetings, scheduled for October 14, 2021, and October 28, 2021, is to seek the Committee’s guidance regarding the policy topic(s) of focus and associated evaluation methods for the remaining cohorts of the MTW Expansion. This document introduces a set of potential policy areas of focus for the Committee’s consideration during the October 14th and October 28th meetings. During the October 14th Committee meeting, HUD invites Committee members to propose additional policy topics for consideration. The deliberations regarding which policy topics to ultimately pursue should be informed by the policies HUD is testing in the three other MTW Expansion cohorts that are already underway and the statutory requirements regarding the PHAs to be included in the MTW Expansion, which are summarized in Appendix A.

I. Status of the Current MTW Expansion

The 2016 Appropriations Act (also referred to as the MTW Expansion Statute) directs HUD to add PHAs to the MTW Demonstration Program by cohort and to rigorously evaluate one specific policy change for each cohort. Under the advisement of the Committee, the MTW Expansion PHAs will be added in four to five cohorts. Based on the Committee’s recommendations, HUD has established the overall policies to be studied in the first three cohorts of the MTW Expansion as:

- *MTW Flexibility for Smaller PHAs Cohort:* In this cohort, the overall effects of MTW flexibility on smaller PHAs, defined as PHAs administering 1,000 or fewer combined units, and the residents/participants it serves will be evaluated. HUD selected 31 PHAs to participate in this cohort in January of 2021.
- *Stepped and Tiered Rent Cohort:* In this cohort, different rent reform models, including stepped rents and tiered rents, will be evaluated. HUD selected 10 PHAs to participate in this cohort in May of 2021.
- *Landlord Incentives Cohort:* This cohort will evaluate how to improve landlord participation in the Housing Choice Voucher (HCV) program through incentives such as participation payments, vacancy payments, alternative inspection schedules, and other

¹ For information about the Committee, see:
https://www.hud.gov/program_offices/public_indian_housing/programs/ph/mtw/expansion/rac.

methods. After receiving applications in October of 2021, HUD anticipates selecting 30 PHAs to participate in this cohort in early 2022.

A fourth cohort testing work requirements had been planned but the selection notice seeking applications was rescinded by the Department in June 2021, as HUD seeks to continue the MTW Expansion in a way that is responsive to the economic realities and current needs of low-income families. Given the continued salience of the policy topic, however, HUD is pursuing a small research effort that will retrospectively explore the work requirement policies already established at 9 of the initial 39 MTW agencies.

The Department anticipates one or more additional cohorts of the MTW Expansion to ensure that there are 100 designated MTW Expansion PHAs designated as required by the 2016 Appropriation Act.

II. Potential Policy Areas of Focus for the Remaining MTW Expansion Cohorts

To help jumpstart the discussion of potential policy areas of focus for the remaining MTW Expansion cohorts, HUD staff have reviewed past materials generated by and for the Committee and consulted with HUD leadership to establish the following set of potential policy areas of focus for discussion:

- Asset Building
- Sponsor-Based Housing
- Project-Based Vouchers
- MTW Flexibility for Small/Medium PHAs

HUD is interested in hearing Committee feedback on these four topic areas, as well as any additional policy suggestions beyond these topic areas that the Committee members might themselves propose, particularly as it relates to “big idea” program reforms HUD may want to test. The Department acknowledges that HUD’s core programs haven’t changed much in the past 50 years, and the MTW Expansion represents a valuable opportunity to explore big new ideas in a controlled environment where evaluation of the policy change being tested is a key design feature. A thumbnail sketch of the four proposed policy areas of focus is included below. HUD asks that Committee members consider the following three criteria when weighing the relative merits of all potential policy topics:

- 1) the policy importance of the proposed topic,
- 2) the relationship of the policy area of focus to the statutory objectives of the MTW program,² the feasibility according to the statutory requirements of the 2016 Appropriations Act (as explained in Appendix A) and the appropriateness of testing the policy within the confines of the MTW Expansion, and
- 3) the evaluability of the policy topic.

² The statutory objectives of the MTW program Demonstration Program are to: 1) Reduce cost and achieve greater cost effectiveness in federal expenditures; 2) Give incentives to families with children where the head of household is working; is seeking work, or is preparing for work by participating in job training, educational programs, or programs that assist people to obtain employment and become economically self-sufficient; and 3) Increase housing choice for eligible low-income families.

For the purposes of the meeting on October 14, 2021, the Committee will focus its discussions and deliberations on identifying the potential policy areas of focus that seem the most promising as per HUD's three criteria. At the conclusion of the first Committee meeting, the Committee members will individually rate and rank all of the policy topics that are discussed. The second Committee meeting scheduled on October 28, 2021, will then focus exclusively on the set of policy topics that rose to the top during the rating and ranking process at the first meeting. The discussion on October 28th will explore this smaller set of topics more deeply, including consideration of how the cohort might be structured, the key research questions, and evaluation design considerations. After the Committee meetings and in establishing the policy topics of evaluation for future cohort(s) of the MTW Expansion, HUD will vet recommendations from the Committee through HUD leadership and attorneys to ensure feasibility and legality under the MTW Demonstration Program.

A. Asset Building

1. What is Asset Building?

Policies to help very low-income families build assets grew out of the insight that social policy for middle-class families subsidizes the building of assets that can be shared or transferred across generations, such as savings for education and retirement, and home equity, but that anti-poverty policy usually just gives very low-income families money to maintain minimum consumption levels (Oliver, 2001). This fact plus the failure of traditional welfare to end poverty led to the question: Would anti-poverty programs that support asset building for very low-income households be more effective? (Sherraden, 1988). The basic policy tool is to put money into assets such as individual development accounts (IDAs), educational savings plans, and even home equity, but also simply into an emergency fund that families can use for unexpected expenses such as car repairs or medical bills.

HUD-funded asset building programs for very low-income families include HUD's Family Self-Sufficiency (FSS) Program operating at about 700 PHAs in which families can save earned income in an escrow account that they receive upon completing an individual development plan. A recent evaluation showed that three years into the five-to-seven-year program, FSS did not increase work or earnings but did increase financial literacy and having a bank account (Verma et al., 2021). Some MTW self-sufficiency programs have tried to enable both emergency funds and longer-term asset building by allowing families to dip into their escrow accounts before graduating from the self-sufficiency program.

Homeownership is subsidized today by a few PHAs. These programs are small and have not been evaluated. HUD's Hope 3 program launched in 1992 and gave grants to non-profits to subsidize acquisition of homes for low-income families. As of 1995, Hope 3 had subsidized acquisition of 1,234 homes for low- and very low-income families, including former residents of public housing.

Credit-building is another kind of asset building. HUD studied the impact of reporting rent payments to credit agencies on the credit scoreability and credit ratings of HUD-

assisted households and found that doing so might increase the number of HUD-assisted individuals with credit scores and improve credit scores for many others (Turner and Walker, 2019).

The U.S. Department of Health and Human Services (HHS) demonstration “Assets for Independence” (1998-2017) studied the impacts of IDAs for recipients of Temporary Assistance to Needy Families (TANF). HHS subsidized the IDAs and restricted their use to buying a home, starting a business, and going to school. The program did not lead to greater home or business ownership or educational attainment, but participating families reported less material hardship than did control families (Mills et al., 2016).

Child development accounts (CDA) are the most common asset building program for very low-income families today.³ A CDA is a 529 college savings plan for which a state or other entity donates some of the funds as seed money or by matching families’ contributions (Huang et al., 2021). Oklahoma’s demonstration, SEED OK, was studied rigorously using random assignment and documented that automatic enrollment greatly increased participation, providing seed funds increased savings, and that participating families were more likely to expect their children to go to college (Huang, et al., 2021).

The “Rewards Card” Model implemented by the Community Link Foundation in Indiana works like earning points on a credit card. Households that shop at Kroger grocery stores get 4 percent back that flows into a Child Savings Account, up to \$600 annually (Elliot, N.D.).

2. How Could MTW Facilitate Asset-Building Policies for HUD-Assisted Households?

MTW PHAs have broad authority to implement occupancy requirements, which could be used creatively. For example, an MTW Expansion cohort could test an opt-out version of the FSS program. MTW PHAs among the initial 39 have created MTW self-sufficiency programs that change the model significantly, for example by allowing families to dip into escrow savings for emergencies or paying into escrow accounts when goals are achieved instead of when earned income increases (which is what the standard FSS program does). Others among the initial 39 have tried to incentivize children’s education. For instance, Tacoma Housing Authority created a term-limited program for parents of children in a local elementary school which required parents to be involved in the school, which led to improved school quality. In addition, because of the broad authority to implement occupancy requirements, an MTW Expansion cohort could require families to enhance financial literacy or participate in a credit building program through rent reporting and other mechanisms.

MTW PHAs are allowed to change how rent is calculated and this flexibility could be

³ In 2020, Prosperity Now estimates there were 109 CDA programs in 36 states with nearly a million participating children. About half of the CDAs are in 529 college savings accounts and half are in savings accounts. (See “Sustaining the Movement: The State of the Children’s Savings Field 2020” by Shira Markoff and Erin Thiemann).

used to incentivize IDAs for children or households. It could be used to help families build an emergency fund.

MTW PHAs are permitted to implement short-term rental assistance and term-limited rental assistance. These flexibilities could be used to support families who are trying to complete educational goals such as earning a GED or getting a college degree (Tacoma Housing Authority has implemented such a program already).

There are probably many other ways to use MTW flexibilities to design and implement an asset building program.

3. Considerations for the Committee

If an MTW Expansion cohort focuses on asset building, what should be the goal of asset building? For instance, should it be to break the cycle of intergenerational poverty or simply to help families build an emergency fund? Or would a reasonable outcome be to help families leave housing assistance or simply to focus on increasing housing stability and decreasing material hardship among assisted families?

How should “assets” be defined? For instance, does it make sense for PHAs to focus on savings and investments, education and training, financial literacy and credit building, or building home equity?

If a policy supports savings and investments, should the use of those assets be restricted? Should there be other conditions on access to the assets (e.g., the traditional FSS program requires that families not be receiving TANF).

Is the MTW Expansion appropriate for testing asset building at PHAs?

Can an MTW PHA promote asset building in the absence of additional funding?

B. Sponsor-Based Housing

1. What is Sponsor-Based Housing?

Sponsor-based housing allows a PHA to expand their capacity to serve households that may need additional support leasing up and/or maintaining housing assistance. Under the sponsor-based housing model, PHAs essentially turn over the housing subsidy to a local partner who screens households for eligibility and manages the administration of the subsidy associated with the household. Often, the sponsor also provides supportive services for program participants that are designed to support their tenancy and/or increase their self-sufficiency.

2. How Could MTW Facilitate Sponsor-Based Housing Policies for HUD-Assisted Households?

Currently, only MTW PHAs have the flexibility to implement sponsor-based housing. Existing MTW PHAs have used this model to serve hard-to-house populations such as

persons who are experiencing homelessness, survivors of domestic violence, persons with a substance abuse disorders, youth aging out of foster care, and people exiting the criminal justice system. Sponsors may use funds to secure private market rentals, typically through contracts with terms of 15 or 20 years, that are then subleased to program participants (commonly referred to as master leasing). Certain administrative responsibilities (e.g., eligibility determinations, income recertifications, waitlist management) are delegated to the qualified sponsor and the MTW PHA is required to perform an annual quality control audit.

The authority to establish a sponsor-based housing program for MTW Expansion PHAs is included in the *Operations Notice for the Expansion of the Moving to Work Demonstration Program*⁴ as waiver 17, which allows for the establishment of local, non-traditional activities including alternative rental subsidy programs, service provision, and housing development programs. Implementation of a sponsor-based housing program supports the third statutory objective of the program to increase housing choice for low-income families.

3. Considerations for the Committee

Studying sponsor-based housing was previously discussed during the initial Committee meetings held in July 2016 and September 2016 when the Committee was considering policy topics of interest for the overall MTW Expansion.⁵ After a fair amount of discussion, the Committee concluded that there was interest in studying sponsor-based housing, specifically in understanding whether the establishment of a sponsor-based housing program increases the capacity of PHAs to serve certain hard-to-serve populations. Concerns were raised, however, regarding whether smaller PHAs would have the capacity to find and forge the local partnerships that sponsor-based housing initiatives rely on and the fact that PHAs usually build these projects over a long period of time that might preclude study within a defined timeframe.

Studying sponsor-based housing also raises valid methodological questions regarding how to structure a rigorous evaluation, including the specification of well-defined research questions, the ability to develop (and collect) data in support of a reasonable set of outcome measures, and the ability to develop a meaningful control or comparison group.

C. Project-Based Voucher Flexibility

1. What is Project-Based Voucher Flexibility?

One way that PBVs are used is to stabilize public housing converting through the

⁴ The Operations Notice is available at this link: <https://www.federalregister.gov/documents/2020/08/28/2020-18152/operations-notice-for-the-expansion-of-the-moving-to-work-demonstration-program>.

⁵ See meeting minutes from the July and September 2016 Committee meetings, as well as the 2016 memo on *Sponsor-Based Housing Models Administered by MTW Agencies* shared with the Committee prior to the September 2016 Committee meeting. All documents can be found here: https://www.hud.gov/program_offices/public_indian_housing/programs/ph/mtw/expansion/rac.

Rental Assistance Demonstration (RAD), to preserve affordability on existing market rate rentals, and to support the development of new subsidized housing (often combined with Low-Income Housing Tax Credit (LIHTC)). PBVs can also be used to provide supportive housing for specific populations, like veterans and formerly homeless families.

2. How Could MTW Facilitate Project-Based Voucher Flexibility Policies for HUD-Assisted Households?

MTW PHAs have several important flexibilities related to the PBV program. Normally, PBVs cannot make up more than 25% of a development or more than 20% of a PHA's voucher portfolio.⁶ Those caps are raised or eliminated for MTW PHAs. The MTW Operations Notice also provides other PBV flexibilities that might help PHAs better utilize PBVs to address local needs.

3. Considerations for the Committee

At the first Committee meeting in July 2016, the Committee considered the topic of increasing or lifting PBV caps (that is, the total number of authorized voucher units a PHA may project-base across its portfolio and the number of authorized voucher units a PHA may project-base within a property). The PBV program has continued to grow rapidly since then. Prior to 2016, only about 1% of vouchers were project-based. As of June 2021, there were 279,428 PBVs, making up 12.3% of the overall voucher program.⁷

When the Committee discussed PBVs in 2016, there seemed to be consensus that PBVs are an interesting and important topic for further study. However, it was not clear whether/how an MTW Expansion cohort focused specifically on PBVs would be valuable. HUD already has done research finding that the 39 initial MTW PHAs use PBVs more than non-MTW PHAs; HUD could do additional PBV research focused on legacy MTW PHAs. HUD could also study PBV usage among MTW Expansion PHAs without dedicating a cohort to the topic. For example, PHAs in the first cohort (flexibility for small PHAs) can use all PBV waivers in the MTW Operations Notice; HUD could study PBVs within that cohort rather than dedicating a new cohort to PBVs.

The benefits of having a cohort focus on a specific topic are: 1) to create a framework for high-quality research, such as random assignment of a policy change, 2) to provide flexibility/waivers that go beyond what would otherwise be permitted by the Operations Notice, or 3) to focus on a specific model, in contrast to broad flexibilities permitted by the Operations Notice. It would be helpful for the Committee to consider whether/how any of these benefits apply to a potential PBV cohort. It would also be helpful for the Committee to consider what outcomes would be most relevant for a

⁶ Housing Opportunity Through Modernization Act of 2016 (HOTMA) increases the project cap to 30% if the units are set aside for people experiencing homelessness, veterans, or other excepted populations.

⁷ Source: HUD HCV Data Dashboard (https://www.hud.gov/program_offices/public_indian_housing/programs/hcv/dashboard).

PBV cohort, and how HUD could evaluate the cohort.

D. MTW Flexibility for Small/Medium PHAs

1. What is an MTW Flexibility for Small/Medium PHAs Cohort?

As described previously in the memo, the first cohort of MTW PHAs is testing the impact of the overall package of MTW flexibilities on smaller PHAs. The goal of the evaluation is to answer two questions: 1) How do smaller PHAs use their MTW flexibility? and 2) What are the consequences (impacts) of MTW flexibility on smaller PHAs and their tenants? The evaluation is structured as an experiment where outcomes related to the statutory objectives of the MTW demonstration will be compared between the treatment PHAs (the PHAs randomly selected to apply for MTW designation from among the eligible applicants) and the control PHAs (the PHAs not selected to apply for MTW designation from among the eligible applicants). As a part of this evaluation, the research team has defined a set of outcome measures that can be used to assess progress towards the three statutory objectives of cost effectiveness, self-sufficiency, and housing choice.⁸

2. How Could MTW Facilitate an MTW Flexibility for Small/Medium PHAs Cohort?

HUD could choose to focus a second cohort on the impact of the overall package of MTW flexibilities on both small *and* medium-sized PHAs (for purposes of this memo, PHAs with 1,000 or less combined units of public housing and vouchers would be considered “small” and PHAs with between 1,000 and 6,000 combined units of public housing and vouchers would be considered “medium”). A second cohort with this focus would lift the current size restriction that were applied to the first cohort and expand the research question from the effects of MTW on small PHAs to a broader study question applicable to medium-sized PHAs, as well. A similar research design as has been adopted for the current flexibility cohort could be replicated in an additional flexibility cohort.

3. Considerations for the Committee

A second flexibility cohort has appeal as a low-barrier opportunity for small and medium-sized PHAs to join the MTW expansion. Following the selection of PHAs for participation in the landlord incentive cohort, HUD expects that there will be no remaining slots for larger PHAs,⁹ therefore identifying a cohort focus that both appeals to smaller and medium-sized PHAs and minimizes any barriers to participation is an important consideration. Cohorts testing a specific policy impose a requirement to applicant PHAs that may deter some PHAs from applying. A flexibility cohort offering the full range of MTW flexibilities allows applicant PHAs to design their own

⁸ The Research Design, Data Collection and Analysis Plan that details the outcome measures to be tracked can be found here: <https://www.huduser.gov/portal/sites/default/files/pdf/Evaluation-Cohort1-RDDCAP-2021.pdf>.

⁹ The MTW Expansion Statute allows no more than three PHAs in the larger size category (6,001-27,000 aggregate voucher and public housing units), and two of those slots have been filled in Stepped and Tiered Rent Cohort. HUD expects the third slot to be filled in the Landlord Incentives Cohort.

MTW program and should have the widest appeal to prospective PHAs, since it places the least research restrictions on applicants.

Appendix A. Status of PHA Selection Requirements in the MTW Expansion

The 2016 Appropriations Act contains requirements on: Geographic Diversity of MTW Expansion PHAs, Size of MTW Expansion PHAs and RAD Participation of MTW Expansion PHAs. Below is a summary of how the Department is addressing each of these requirements.

Geographic Diversity

According to the 2016 Appropriations Act, the selection of PHAs to the MTW Expansion shall be based on ensuring the geographic diversity of MTW PHAs. Geographic diversity is to be assessed according to the locations of the existing 39 MTW PHAs in conjunction with the additional 100 PHAs to be selected under the MTW Expansion. In order to ensure geographic diversity of MTW PHAs, HUD will continue to consider the location of MTW Expansion PHAs where appropriate throughout the selection processes. HUD may adjust how geographic diversity is considered by cohort depending on its ability to meet the other requirements of the 2016 Appropriations Act on rigorous evaluation, PHA size and RAD participation.

The Department first established a deliberate strategy to select PHAs for the MTW Flexibility for Smaller PHAs Cohort of the MTW Expansion according to five geographic regions. Using the national population as a starting point, HUD created five geographic regions that each have roughly the same share of the population. For each geographic region, HUD determined a target number of PHAs to be randomly assigned to receive MTW designation based upon whether current MTW PHAs were located in the geographic region. HUD received letters of interest from 43 eligible applicant PHAs for this cohort. Due to the location of the 43 eligible applicant PHAs and how they were disbursed across the five geographic regions, the target numbers were adjusted slightly to ensure an equitable lottery for each of the five geographic regions was possible. The result was a highly geographically diverse cohort of the MTW Expansion with a large number of PHAs (31) receiving MTW designation.

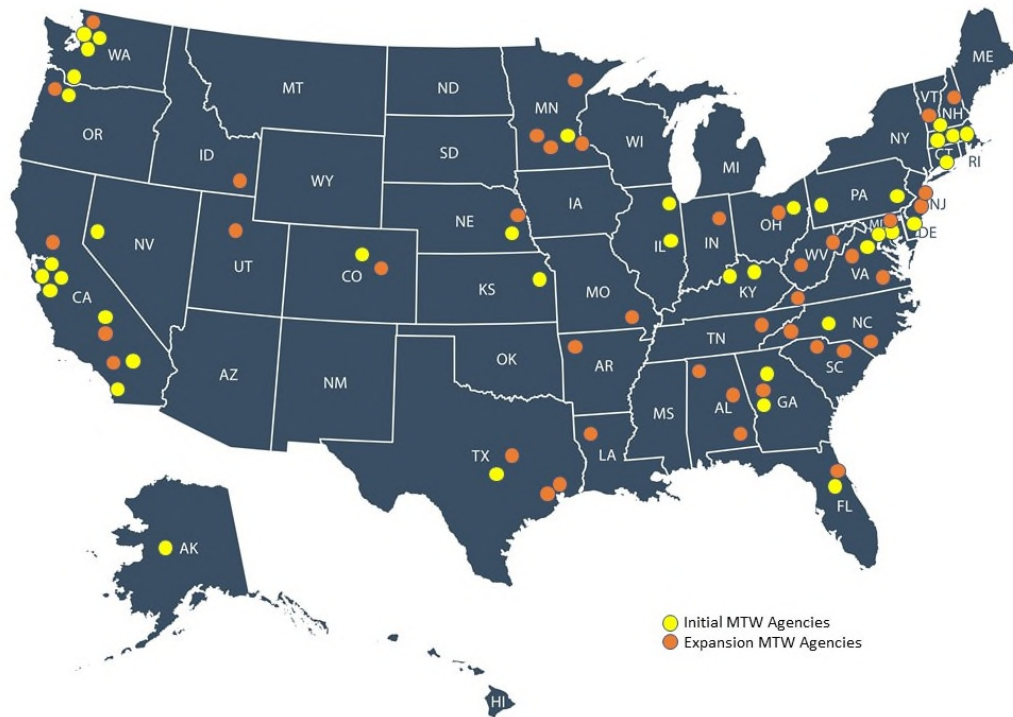
In the Stepped and Tiered Rent Cohort of the MTW Expansion, the rigorous research design includes random assignment of households within a PHA. The expertise and PHA size required to successfully execute such a research design required high-capacity applicant PHAs that would be able to implement policies within specific requirements and parameters. A high level of HUD and evaluator support to PHAs participating in this cohort of the MTW Expansion is also necessary. Each of the 10 PHAs selected for this cohort are from a different state.

In the Landlord Incentives Cohort of the MTW Expansion, the rigorous research design requires lotteries to be held for three different PHA size categories (one lottery for PHAs that administer 1,000 or fewer aggregate voucher and public housing units, one lottery for PHAs that administer 1,001-6,000 aggregate voucher and public housing units, and one lottery for PHAs that administer 6,001-27,000 aggregate voucher and public housing units). It may therefore be difficult to preserve random assignment of PHAs and layer geographic diversity on top of the size category requirements. HUD is currently working on how to best establish lottery elements for this cohort.

To ensure that the MTW Expansion achieves and maintains geographic diversity throughout the PHA selection processes, going forward HUD will track the number of MTW PHAs (counting all MTW PHAs, including the initial 39 MTW PHAs in conjunction with the additional PHAs

selected under the MTW Expansion) in proportion to the population of each state. This will necessitate that geographic diversity be incorporated into the selection of MTW Expansion PHAs in future cohorts.

Below is a graphic of the geographic distribution of MTW PHAs to date:



PHA Size Requirements

According to the 2016 Appropriations Act, of the 100 PHAs to be selected under the MTW Expansion: No less than 50 PHAs shall administer 1,000 or fewer aggregate voucher and public housing units; No less than 47 PHAs shall administer 1,001-6,000 aggregate voucher and public housing units; No more than 3 PHAs shall administer 6,001-27,000 aggregate voucher and public housing units; and No PHA shall be granted MTW designation if it administers in excess of 27,000 aggregate voucher and public housing units.

The selection criteria for the MTW Flexibility for Smaller PHAs Cohort of the MTW Expansion required that applicant PHAs administer 1,000 or fewer aggregate voucher and public housing units. HUD selected 31 PHAs of that size for this cohort.

The selection criteria for the Stepped and Tiered Rent Cohort of the MTW Expansion required that applicant PHAs administer more than 1,000 aggregate voucher and public housing units. HUD selected 10 PHAs for this cohort. Two of the 10 PHAs were in the 6,001-27,000 unit category and 8 of the 10 PHAs were in the 1,001-6,000 unit category.

The selection criteria for the Landlord Incentives Cohort of the MTW Expansion requires only that applicant PHAs not administer more than 27,000 aggregate voucher and public housing

units. HUD anticipates selecting 30 PHAs for this cohort. Applications for this cohort are due on October 15, 2021. It is unknown how the selectees will break down across the size categories. Estimates are included in italics in the size category table below. HUD will not exceed the statutory caps in the 2016 Appropriation Act.

| Size Category | Statutory Target | MTW Flexibility for Smaller PHAs Cohort | Stepped and Tiered Rent Cohort | Landlord Incentives Cohort | Future Cohort(s) | TOTAL |
|----------------------|------------------|-----------------------------------------|--------------------------------|----------------------------|------------------|-----------|
| ≤ 1,000 | 50 | 31 | 0 | <i>14</i> | TBD | 45 |
| 1,001 – 6000 Units | 47 | 0 | 8 | <i>15</i> | TBD | <i>23</i> |
| 6,001 – 27,000 Units | 3 | 0 | 2 | <i>1</i> | TBD | 3 |
| ≥ 27,001 Units | 0 | 0 | 0 | 0 | 0 | 0 |

Rental Assistance Demonstration (RAD) Portfolio Award¹⁰

According to the 2016 Appropriations Act, of the 100 PHAs to be selected under the MTW Expansion, a minimum of five of the PHAs selected shall have a RAD portfolio award that has converted the PHA’s entire public housing inventory to RAD.

In the MTW Flexibility for Smaller PHAs Cohort of the MTW Expansion, 5 of the 31 PHAs selected had a RAD portfolio award. In the Stepped and Tiered Rent Cohort of the MTW Expansion, 1 of the 10 PHAs selected had a RAD portfolio award. HUD has therefore already met this requirement of the 2016 Appropriations Act. HUD will continue to monitor the number of PHAs selected in future cohorts of the MTW Expansion with RAD portfolio awards but will not specifically target PHAs to be selected for this purpose.

| RAD Requirement | Statutory Target | MTW Flexibility for Smaller PHAs Cohort | Stepped and Tiered Rent Cohort | Landlord Incentives Cohort | Future Cohort(s) | TOTAL |
|---------------------|------------------|-----------------------------------------|--------------------------------|----------------------------|------------------|-------|
| RAD Portfolio Award | 5 | 5 | 1 | TBD | TBD | 6 |

¹⁰ A RAD portfolio award is defined for these purposes as a conversion of a PHA’s entire public housing inventory to RAD. All RAD conversions must be closed and the former public housing units removed from IMS/PIC in order to satisfy the portfolio-wide requirement.

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