



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, DC 20410-5000

OFFICE OF PUBLIC AND INDIAN HOUSING

Special Attention of:
Directors of HUD Regional and Field
Offices of Public Housing;
Agencies that Administer the
Housing Choice Voucher Program

Notice PIH 2019-15 (HA)

Issued: July 5, 2019

Expires: This Notice remains in effect until
Amended, superseded or rescinded

Cross References: *Implementation of the
HUD-Veterans Affairs Supportive Housing
(HUD-VASH) Program* published in the
Federal Register on March 23, 2012.

SUBJECT: REGISTRATION OF INTEREST FOR HUD-VASH VOUCHERS

1. Purpose. This notice announces the availability of \$40 million in HUD-VASH that will support approximately 5,000 new vouchers. These vouchers are administered in partnership with the Department of Veterans Affairs (VA) and enable homeless veterans and their families to access affordable housing and supportive services.

HUD-VASH vouchers are authorized under section 8(o)(19) of the United States Housing Act of 1937. The Consolidated Appropriations Act, 2019 (Public Law 116-6, approved February 15, 2019) (the Act) provides \$40 million in funding for the vouchers being made available under this notice.

2. Background. The HUD-VASH program combines HUD Housing Choice Voucher (HCV) rental assistance for homeless veterans with case management and clinical services provided by local Department of Veterans Affairs (VA) Medical Centers (VAMCs), community-based outpatient clinics (CBOCs), or other entities as designated by the Secretary of the Department of Veterans Affairs. The VA medical facility refers all eligible HUD-VASH families to the partnering Public Housing Agency (PHA).

Generally, the HUD-VASH program is administered in accordance with 24 CFR Section 982 and 983 (in cases where VASH vouchers are project-based). However, the Act allows HUD (in consultation with the VA) to waive or specify alternative requirements for any provision of any statute or regulation that HUD administers in connection with this program in order to effectively deliver and administer HUD-VASH assistance (*except for requirements related to fair housing, nondiscrimination, labor standards, and the environment*), upon a finding by the Secretary that any such waivers or alternative requirements are necessary for the effective delivery and administration of such voucher assistance. Established waivers and alternative requirements for HUD-VASH are detailed in *Section 8 HCV: Revised Implementation of the HUD-VASH Program (Operating Requirements)* published in the *Federal Register* on March 23, 2012 (77 FR 17086), as amended at **79 FR 34769** (published June 18, 2014). This and other documents pertinent to the program can be found on the HUD-VASH website at:
https://www.hud.gov/program_offices/public_indian_housing/programs/hcv/vash.

3. Summary of Fiscal Year 2019 Allocation Process. Under the Act, HUD-VASH funding awards must be allocated based on geographic need, PHA administrative performance, and other factors specified by HUD. Consistent with the requirements of the Act, HUD will award tenant-based HUD-VASH vouchers based on geographic need to PHAs who self-identify to HUD their interest in receiving an award. As in fiscal year 2018, awards will follow a two-step process:

(1) Eligible PHAs will respond to this notice with an email and a VA Letter of Support (collectively referred to as the *Registration of Interest*). See **Section 7** of this notice for detailed instructions.

(2) Based on a relative need formula (see **Section 8** of this notice), registered PHAs will receive an invitation to apply for a specific number of HUD-VASH vouchers.

PHA eligibility will be determined as detailed in **Section 6** of this notice and based on PHA demonstrated HUD-VASH leasing capacity. The leasing capacity criteria ensures HUD-VASH vouchers go to PHAs in communities where there is the greatest likelihood that homeless veterans will be housed promptly. The leasing capacity, or utilization threshold criteria, is explained in detail in **Section 6.a.** of this notice.

4. Registration of Interest Due Date. Registrations of Interest must be submitted electronically to **VASH_ROI@hud.gov** no later than midnight in the time zone of the PHA on **August 19, 2019**. See **Section 7** for all Registration of Interest Requirements.

5. Eligible Applicants. Any PHA currently administering an HCV program and who also meets the threshold criteria detailed in **Section 6** of this notice is eligible to submit a Registration of Interest. PHAs that do not currently administer the HUD-VASH program do not have to meet the threshold requirements outlined in **Section 6.a.** of this notice. PHAs that do not currently administer the HUD-VASH program are eligible to submit a Registration of Interest, if the threshold requirements in **Section 6.b.** are met. *Tribes/TDHEs and non-profit agencies that only administer HCV Mainstream vouchers are not eligible to submit a Registration of Interest under this notice.*

6. PHA Threshold Criteria. The following threshold factors must be met in order for the PHA to be eligible to receive an award of HUD-VASH vouchers through this notice.

- a. The threshold criteria described in this section applies only to PHAs with an existing HUD-VASH Program with: (1) 25 or more HUD-VASH vouchers, and (2) that do not meet other exception criteria as defined in this section.
 - PHAs **must** have at least a 70 percent (%) HUD-VASH unit utilization rate. *The unit utilization rate will be defined as HUD-VASH March 2019 Unit Months Leased (UML) divided by total number of HUD-VASH vouchers awarded to date, as reported in the Voucher Management System (VMS);* or
 - If a PHA does not have at least a 70 percent (%) HUD-VASH unit utilization rate,

they must have greater than 100% HCV program budget utilization. *The budget utilization rate will be defined as HCV HAP¹ expended as of March 2019 divided by the total HCV budget authority awarded to date as reported in the VMS. For example, a PHA with a HUD-VASH unit utilization rate of 68% and an overall HCV budget utilization rate of 90% of their Annual Budget Authority would not be eligible for a HUD-VASH award under this notice. However, a PHA with 68% HUD-VASH unit utilization rate and a 101% HCV budget utilization rate would be eligible to receive additional HUD-VASH vouchers.*

Exceptions to the threshold criteria: PHAs will be excepted from the criteria in paragraph (a) above in cases where:

- (1) the PHA did not receive a fiscal year 2017 or 2018 HUD-VASH award; **AND**
- (2) the PHA's highest number of HUD-VASH vouchers ever leased within any given 12-month period equals or exceeds their current number of available HUD-VASH vouchers based on HUD and VA data.

Example: A PHA has not received an allocation of HUD-VASH vouchers since Fiscal Year 2012. The highest number of HUD-VASH vouchers leased in any one year is 67 vouchers. As of March 2019, this PHA has 64 HUD-VASH vouchers available, which is the difference between their total HUD-VASH vouchers awarded and March 2019 UML. ***This PHA would meet the exception criteria because their highest leasing number of 67 exceeds the 64 vouchers currently available.***

PHAs with fewer than 25 HUD-VASH vouchers are excepted from all the above threshold criteria and are eligible to submit a Registration of Interest. PHAs with very small HUD-VASH programs have more volatile utilization rates. A turnover of one or two (2) vouchers can cause them to be below the 70 percent (%) unit utilization threshold and would penalize them unfairly. HUD will continue to monitor these small programs through our on-going utilization efforts to ensure maximum leasing.

PHAs that submit a Registration of Interest but do not meet the utilization threshold criteria will be notified and given an opportunity to provide additional data.

If a PHA is uncertain about whether they meet the threshold criteria, they can send an email to **VASH@hud.gov**.

- b. PHAs, as required by the Act, must demonstrate the capacity to successfully administer the program. Therefore, PHAs must not have any major unresolved program management findings from an Inspector General audit, HUD management review, or Independent Public Accountant audit for the PHA's HCV program, or other significant program compliance issues that were not resolved, or are not in the process of being resolved, as determined by HUD, prior to this notice's Registration of Interest deadline. Additionally, applicants must resolve all outstanding civil rights matters to HUD's

¹ Housing Assistance Payment (HAP)

satisfaction prior to this notice's Registration of Interest deadline, provided that all applicable legal processes have been satisfied.

7. Registration of Interest Requirements. PHAs must consult with their partnering VA facility to discuss their intentions of submitting a Registration of Interest and request a Letter of Support for HUD-VASH vouchers under this notice. Letters of support from the VA do not need to include a specific number of vouchers requested because the number of vouchers offered to a PHA is determined by a formula.

- a. PHAs must send an email to **VASH_ROI@hud.gov** identifying that they are interested in receiving HUD-VASH vouchers. If a PHA partners with more than one VA facility, the PHA must submit *a separate email* with the signed letter of support for **each** VA facility that they are partnering with.
 - The Subject Line of the email must be "Registration of Interest" and the PHA code (i.e. AL001).
 - The body of the email must identify the name of the partnering VAMC or CBOC, the Veterans Integrated Services (VISN) number, and the facility's Station ID. For example: Birmingham VA Medical Center, VISN 7, Station 521.
- b. All Registrations of Interest must include a signed Letter of Support from the partnering VA facility.
 - If a PHA partners with more than one VA facility, a signed Letter of Support from **each** partnering VA facility must accompany **each** email submission.
 - A Registration of Interest submission without a valid, corresponding letter of support *is not curable and will not be considered for an award*.

Any additional attachments beyond the signed VA letter of support will NOT impact selection for an award.

- c. The Registration of Interest deadline is **August 19, 2019**. All Registrations of Interest must be transmitted by 11:59 p.m. in your local time zone.
 - After a successful email transmission to **VASH_ROI@hud.gov**, the sender will receive an "auto-reply" message, confirming receipt of an email. If you do not receive an "auto-reply" confirming receipt, your email was not received, and the agency will not be considered for an award. Faxes and hard copy submissions will not be accepted. *Note: receipt of an "auto-reply" message does not validate whether or not the Registration of Interest is complete. Please review the notice in its entirety to ensure all requirements are met.*

PHAs are encouraged to consult with representatives of the Continuum of Care (CoC) to discuss their intention of submitting a Registration of Interest. CoC planning is a critical tool in

identifying resources, assessing a community's capacity and developing solutions to challenges that the homeless families and children experience. PHAs are not required to provide a Letter of Support from the CoC or partnering agencies.

8. Formula Used for Allocating HUD-VASH Vouchers. The allocation of HUD-VASH vouchers will be awarded based on a relative need formula incorporating the VA Gap Analysis of CoC and local VAMC data.

9. Minimum/Maximum Number of Vouchers. HUD has established a minimum and maximum number of vouchers offered under this notice. Any single PHA may be invited to apply for a minimum of five (5) vouchers and a up to five hundred (500) vouchers under this notice; this is applicable to both new and existing administrators of the HUD-VASH program.

10. Invitation of PHAs. Selected PHAs will receive an invitation via email to apply for a specific number of HUD-VASH vouchers. This number is the maximum number of vouchers being offered. PHAs may apply for fewer vouchers. Additional instructions will be included in the invitation letter. Final award determinations will be at the discretion of HUD.

HUD may award any remaining HUD-VASH funds via invitation to additional PHAs at any time based on availability of funding and geographic need as required by the 2019 Act.

11. Conversion to Project-Based Vouchers. All tenant-based HUD-VASH awards can be converted to Project-Based Vouchers (PBV) at any time after allocation without HUD approval, so long as the PHA meets the PBV requirements of 24 CFR Part 983, as amended. For additional guidance, PHAs can review [PIH Notice 2017-21](#), Implementation Guidance: Housing Opportunity Through Modernization Act of 2016 (HOTMA) — Housing Choice Voucher (HCV) and Project-Based Voucher (PBV) Provisions.

12. Information Contact. All inquiries about this notice should be directed to VASH@hud.gov.

13. Paperwork Reduction Act. The information collection requirements contained in this Notice have been approved by the Office of Management and Budget (OMB) under the Paperwork Reduction Act (PRA) of 1995 (44 U.S.C 3520). In accordance with the PRA, HUD may not conduct or sponsor, and a person is not required to respond to, a collection of information unless the collection displays a currently valid OMB control number. The active information collections contained in this Notice have been approved under the PRA OMB Control Number 2577-0169.

/s/

R. Hunter Kurtz
Assistant Secretary for
Public and Indian Housing