

PHA Name : Lewiston Housing Authority

PHA Code : ME005

MTW Supplement for PHA Fiscal Year Beginning : (MM/DD/YYYY): 7/1/2023

PHA Program Type: Combined

MTW Cohort Number: Landlord Incentives

MTW Supplement Submission Type: Annual Submission

B. MTW Supplement Narrative.

Lewiston Housing was selected through a rigorous application process as a Moving to Work (MTW) organization in the 25th anniversary year of the MTW Demonstration Program. First authorized by Congress in 1996, MTW is a demonstration that provides public housing authorities (PHAs) the opportunity to redefine how they operate by giving them the flexibility to try "outside the box" ideas that address community needs in innovative and creative ways. MTW allows PHAs the flexibility to create customized solutions to their community's specific challenges. With the addition of the 29 PHAs selected for this cohort, HUD will have added 70 PHAs to the MTW Demonstration Program since January 2021. MTW PHAs are now in 38 states and the District of Columbia.

MTW encourages an entrepreneurial spirit to think of and create solutions in a new way. Public housing authorities (PHA) in the MTW demonstration have pioneered several innovative policy interventions that have been successful at the local level and subsequently rolled out to the rest of the country's PHAs. Examples include requiring less frequent recertifications for those on a fixed income, increasing payment standards for the reasonable accommodation of persons with disabilities, and allowing the owners to maintain site-based waiting lists for project-based vouchers.

Lewiston Housing seeks to further Moving to Work (MTW) statutory objectives of reducing costs, enhancing self-sufficiency incentives and services to residents, and increasing housing choice through short-term and long-term MTW waivers and initiatives. With MTW funding and regulatory flexibility, Lewiston Housing (LHA) seeks to operate efficiently and effectively to stretch limited public dollars to meet the expanding needs of a growing low-income population in Lewiston, Maine. Lewiston Housing will build on its creativity and strength as a real estate manager and a HUD High-performer in meeting the affordable housing needs of the Lewiston community as it faces new and increasing demands for quality housing in Lewiston.

Through Moving to Work, Lewiston Housing can help address substantial housing challenges in the region. Real Estate Market Assessment (MA) analysis in 2020 and 2021 shows an 18% to 21% increase in actual rents for 1-, 2-, and 3-bedroom standard units in just one year; these unit types are now an estimated 121%, and 126% of the Fair Market Rent (FMR) and expected to remain at this elevated level. The assessment reports American Communities Survey data showing an overall rental vacancy rate in Androscoggin County of 2.2%, less than half of the 5% rate typically associated with normal turnover and providing choices for renters seeking housing in the market. The assessment estimated that the vacancy rate within Lewiston city is even lower, as in-migrating families are generally low-income, and market rents do not support the production of additional units, either through new construction or renovation of obsolete or otherwise off-line units. Further, the MA stated that most affordable and mixed-income properties had no vacancies, reporting 100% occupancy. Public consulting and gap analysis conducted by the Auburn Lewiston HOME Consortium (completed September 2022 for the HOME-ARP Plan amendment) substantiated these market demands and illuminated increasing rent and household expenses along with a low number of affordable housing units coming online in future years that can drive up numbers of homeless families in Lewiston without system-level interventions. Situated north of Portland, Lewiston has become a major resettlement location for immigrant and refugee families with children from Africa and the Middle East and other Maine families with children who have been priced out of the Portland and coastal regional housing markets; this trend is expected to continue.

Through the following MTW activities, Lewiston Housing plans to reduce costs and achieve greater cost-effectiveness in federal expenditures:

- 3.a. Alternative Reexamination Schedule for Households (PH)
- 3.b. Alternative Reexamination Schedule for Households (HCV)
- 3.d. Self-Certification of Assets (HCV)
- 5.a. Pre-Qualifying Unit Inspections (HCV)

By adopting these waivers, Lewiston Housing will be able to work more efficiently and save operating expenses on these activities. Overall, there will be cost savings for the agency and the ability to redeploy resources to work more closely with families to achieve greater self-sufficiency.

Through the following MTW activities, Lewiston Housing increases housing choices for low-income families:

- 2.b. Payment Standards - Fair Market Rents (HCV)
- 4.a. Vacancy Loss (HCV - Tenant-Based Assistance)
- 5.a. Pre-Qualifying Unit Inspections (HCV)
- 9.a. Increase PBV Program Cap (HCV)
- 9.b. Increase PBV Project Cap (HCV)
- 9.c. Elimination of PBV Selection Process for PHA-owned Projects Without Improvement, Development, or Replacement (HCV)

Lewiston Housing is part of the MTW Landlord Incentive Cohort, and by adopting 4.a. and 5.a., Lewiston Housing will provide incentives for Landlords to continue to lease to HCV participants.

As rental housing is extremely limited in Lewiston and current record low vacancy rates, adopting 9.a., 9.b., 9.c., 15, and 17.c. will allow Lewiston Housing to create new housing opportunities that do not currently exist in Lewiston for low-income families.

This MTW Supplemental Plan closely reflects our FY22 submission as we recently submitted it (March 1, 2023). There are two additional waiver requests: 2b Payment Standards- Fair Market Rents (HCV) and expanded 17c for a new affordable housing development.

We are ending 3.c. Self-Certification of Assets (PH) as this is covered under new HOTMA guidelines during FY23.

C. The policies that the MTW agency is using or has used (currently implement, plan to implement in the submission year, plan to discontinue, previously discontinued).

1. Tenant Rent Policies	
a. Tiered Rent (PH)	Not Currently Implemented
b. Tiered Rent (HCV)	Not Currently Implemented
c. Stepped Rent (PH)	Not Currently Implemented
d. Stepped Rent (HCV)	Not Currently Implemented
e. Minimum Rent (PH)	Not Currently Implemented
f. Minimum Rent (HCV)	Not Currently Implemented
g. Total Tenant Payment as a Percentage of Gross Income (PH)	Not Currently Implemented
h. Total Tenant Payment as a Percentage of Gross Income (HCV)	Not Currently Implemented
i. Alternative Utility Allowance (PH)	Not Currently Implemented
j. Alternative Utility Allowance (HCV)	Not Currently Implemented
k. Fixed Rents (PH)	Not Currently Implemented
l. Fixed Subsidy (HCV)	Not Currently Implemented
m. Utility Reimbursements (PH)	Not Currently Implemented
n. Utility Reimbursements (HCV)	Not Currently Implemented
o. Initial Rent Burden (HCV)	Not Currently Implemented
p. Imputed Income (PH)	Not Currently Implemented
q. Imputed Income (HCV)	Not Currently Implemented
r. Elimination of Deduction(s) (PH)	Not Currently Implemented
s. Elimination of Deduction(s) (HCV)	Not Currently Implemented
t. Standard Deductions (PH)	Not Currently Implemented
u. Standard Deductions (HCV)	Not Currently Implemented
v. Alternative Income Inclusions/Exclusions (PH)	Not Currently Implemented
w. Alternative Income Inclusions/Exclusions (HCV)	Not Currently Implemented
2. Payment Standards and Rent Reasonableness	
a. Payment Standards- Small Area Fair Market Rents (HCV)	Not Currently Implemented
b. Payment Standards- Fair Market Rents (HCV)	Plan to Implement in the Submission Year
c. Rent Reasonableness – Process (HCV)	Not Currently Implemented
d. Rent Reasonableness – Third-Party Requirement (HCV)	Not Currently Implemented
3. Reexaminations	
a. Alternative Reexamination Schedule for Households (PH)	Currently Implementing
b. Alternative Reexamination Schedule for Households (HCV)	Currently Implementing
c. Self-Certification of Assets (PH)	Will be Discontinued in the Submission Year
d. Self-Certification of Assets (HCV)	Currently Implementing
4. Landlord Leasing Incentives	
a. Vacancy Loss (HCV-Tenant-based Assistance)	Currently Implementing
b. Damage Claims (HCV-Tenant-based Assistance)	Not Currently Implemented
c. Other Landlord Incentives (HCV- Tenant-based Assistance)	Not Currently Implemented
5. Housing Quality Standards (HQS)	
a. Pre-Qualifying Unit Inspections (HCV)	Currently Implementing
b. Reasonable Penalty Payments for Landlords (HCV)	Not Currently Implemented
c. Third-Party Requirement (HCV)	Not Currently Implemented
d. Alternative Inspection Schedule (HCV)	Not Currently Implemented
6. Short-Term Assistance	
a. Short-Term Assistance (PH)	Not Currently Implemented
b. Short-Term Assistance (HCV)	Not Currently Implemented
7. Term-Limited Assistance	
a. Term-Limited Assistance (PH)	Not Currently Implemented
b. Term-Limited Assistance (HCV)	Not Currently Implemented
8. Increase Elderly Age (PH & HCV)	

Increase Elderly Age (PH & HCV)	Not Currently Implemented
9. Project-Based Voucher Program Flexibilities	
a. Increase PBV Program Cap (HCV)	Currently Implementing
b. Increase PBV Project Cap (HCV)	Currently Implementing
c. Elimination of PBV Selection Process for PHA-owned Projects Without Improvement, Development, or Replacement (HCV)	Currently Implementing
d. Alternative PBV Selection Process (HCV)	Not Currently Implemented
e. Alternative PBV Unit Types (Shared Housing and Manufactured Housing) (HCV)	Not Currently Implemented
f. Increase PBV HAP Contract Length (HCV)	Not Currently Implemented
g. Increase PBV Rent to Owner (HCV)	Not Currently Implemented
h. Limit Portability for PBV Units (HCV)	Not Currently Implemented
10. Family Self-Sufficiency Program with MTW Flexibility	
a.PH Waive Operating a Required FSS Program (PH)	Not Currently Implemented
a.HCV Waive Operating a Required FSS Program (HCV)	Not Currently Implemented
b.PH Alternative Structure for Establishing Program Coordinating Committee (PH)	Not Currently Implemented
b. HCV Alternative Structure for Establishing Program Coordinating Committee (HCV)	Not Currently Implemented
c.PH Alternative Family Selection Procedures (PH)	Not Currently Implemented
c.HCV Alternative Family Selection Procedures (HCV)	Not Currently Implemented
d.PH Modify or Eliminate the Contract of Participation (PH)	Not Currently Implemented
d.HCV Modify or Eliminate the Contract of Participation (HCV)	Not Currently Implemented
e.PH Policies for Addressing Increases in Family Income (PH)	Not Currently Implemented
e.HCV Policies for Addressing Increases in Family Income (HCV)	Not Currently Implemented
11. MTW Self-Sufficiency Program	
a.PH Alternative Family Selection Procedures (PH)	Not Currently Implemented
a.HCV Alternative Family Selection Procedures (HCV)	Not Currently Implemented
b.PH Policies for Addressing Increases in Family Income (PH)	Not Currently Implemented
b.HCV Policies for Addressing Increases in Family Income (HCV)	Not Currently Implemented
12. Work Requirement	
a. Work Requirement (PH)	Not Currently Implemented
b. Work Requirement (HCV)	Not Currently Implemented
13. Use of Public Housing as an Incentive for Economic Progress (PH)	
Use of Public Housing as an Incentive for Economic Progress (PH)	Not Currently Implemented
14. Moving on Policy	
a. Waive Initial HQS Inspection Requirement (HCV)	Not Currently Implemented
b.PH Allow Income Calculations from Partner Agencies (PH)	Not Currently Implemented
b.HCV Allow Income Calculations from Partner Agencies (HCV)	Not Currently Implemented
c.PH Aligning Tenant Rents and Utility Payments Between Partner Agencies (PH)	Not Currently Implemented
c.HCV Aligning Tenant Rents and Utility Payments Between Partner Agencies (HCV)	Not Currently Implemented
15. Acquisition without Prior HUD Approval (PH)	
Acquisition without Prior HUD Approval (PH)	Not Currently Implemented
16. Deconcentration of Poverty in Public Housing Policy (PH)	
Deconcentration of Poverty in Public Housing Policy (PH)	Not Currently Implemented
17. Local, Non-Traditional Activities	
a. Rental Subsidy Programs	Not Currently Implemented
b. Service Provision	Not Currently Implemented

C. MTW Activities Plan that Lewiston Housing Authority Plans to Implement in the Submission Year or Is Currently Implementing

2.b. - Payment Standards- Fair Market Rents (HCV)

Through the PIH Expediated Waiver process, we have previously received authorization to increase our Payment Standard to 120% of FMR. Through the MTW waiver request, we would like to continue this waiver which would otherwise expire on December 31, 2023. We are implementing this waiver to increase housing options for voucher holders. Rents continue to increase unprecedentedly, and vacancy rates remain at record lows. Our voucher utilization rate remains low. Returning to a lower Payment Standard would further reduce housing options for our voucher holders. We do not anticipate any cost implications as we are already at 120% FMR through the non-MTW waiver.

This MTW activity serves the following statutory objectives:

Housing choice

This MTW activity has the following cost implications:

Neutral (no cost implications)

An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households.

The MTW activity applies to all assisted households

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

This is a new implementaion

This MTW activity requires a Hardship Policy. The Hardship Policy is attached.

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Lewiston Housing Authority MTW agency

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

This MTW activity requires an Impact Analysis. The Impact Analysis is attached.

Following will explain the payment standards by FMR:

We plan to continue to use a payment standard that is 120% of FMR.

3.a. - Alternative Reexamination Schedule for Households (PH)

Lewiston Housing will use its MTW Authority to begin recertifying all clients in the Housing Choice Voucher Program (HCV) and the Public Housing Program (PH) on a biennial schedule. The documentation requirements for the recertification process are time-consuming and burdensome, and generally, tenant rents do not vary greatly from year to year. By moving to a biennial recertification schedule, Lewiston Housing will be able to reallocate staff time and talent to other program areas, and staff will have more time to ensure income reviews are accurate and thorough. This activity will also encourage work-eligible residents to go back to work as fewer examinations will give these families a financial incentive to return to work.

Families with an unadjusted income of 90 percent or more from fixed income sources will be exempt from this MTW activity. Lewiston Housing will follow guidelines as determined by the FAST Act of 2016. Lewiston Housing will limit households to one interim recertification per year if the gross household income has decreased by 10% or more. Required interim recertifications (i.e., for changes in household composition or otherwise required by the agency) will not count against the limit. In planning for waiver approval and the new process, Lewiston Housing has randomly divided the total number of HCV and PH households into two equal groups for biennial reexaminations beginning as soon as the plan is approved.

This MTW activity serves the following statutory objectives:

Cost effectiveness;Self-sufficiency

This MTW activity has the following cost implications:

Decreased revenue

An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households.

The MTW activity applies only to a subset or subsets of assisted households

This MTW activity applies to:

New admissions and currently assisted households

An MTW activity may apply to all family types or to selected family types (i.e., non-elderly\non-disabled, elderly, disabled, other).

The MTW activity applies only to selected family types

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

We submitted our MTW plan on March 1, 2023, and waiting for HUD approval at the time of writing. As such, we have not made any accomplishments.

This MTW activity requires a Hardship Policy. The Hardship Policy is attached.

Attached Hardship policy applies to:

3.a. - Alternative Reexamination Schedule for Households (PH);3.b. - Alternative Reexamination Schedule for Households (HCV)}

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Lewiston Housing Authority MTW agency

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

This MTW activity requires an Impact Analysis. The Impact Analysis is attached.

The Impact Analysis that applies to this MTW activity also applies to the following MTW activities:

3.a. - Alternative Reexamination Schedule for Households (PH);3.b. - Alternative Reexamination Schedule for Households (HCV)

Recertification Schedule is

Once every two years

Household may request 1 interim recertifications per year.

In these situations, Lewiston Housing will follow its current Administrative Plan and ACOP, which allow for interim examinations should there be a change in household composition or other circumstances that may adversely affect the family.

3.b. - Alternative Reexamination Schedule for Households (HCV)

Lewiston Housing will use its MTW Authority to begin recertifying all clients in the Housing Choice Voucher Program (HCV) and the Public Housing Program (PH) on a biennial schedule. The documentation requirements for the recertification process are time-consuming and burdensome, and generally, tenant rents do not vary greatly from year to year. By moving to a biennial recertification schedule, Lewiston Housing will be able to reallocate staff time and talent to other program areas, and staff will have more time to ensure income reviews are accurate and thorough. This activity will also encourage work-eligible residents to go back to work as fewer examinations will give these families a financial incentive to return to work.

Families with an unadjusted income of 90 percent or more from fixed income sources will be exempt from this MTW activity. Lewiston Housing will follow guidelines as determined by the FAST Act of 2016.

Lewiston Housing will limit households to one interim recertification per year if the gross household income has decreased by 10% or more. Required interim recertifications (i.e., for changes in household composition or otherwise required by the agency) will not count against the limit.

In planning for waiver approval and the new process, Lewiston Housing has randomly divided the total number of HCV and PH households into two equal groups for biennial reexaminations beginning in FY2023. One group will be recertified between July 1, 2023, and June 30, 2024, and the other group will be recertified beginning July 1, 2024.

This MTW activity serves the following statutory objectives:

Cost effectiveness; Self-sufficiency

This MTW activity has the following cost implications:

Decreased expenditures

An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households.

The MTW activity applies only to a subset or subsets of assisted households

This MTW activity applies to:

New admissions and currently assisted households

An MTW activity may apply to all family types or to selected family types (i.e., non-elderly/non-disabled, elderly, disabled, other).

The MTW activity applies only to selected family types

The MTW activity applies to all tenant-based units

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

We submitted our FY22 MTW plan on March 1, 2023, and waiting for HUD approval at the time of writing. As such, we have not made any accomplishments.

This MTW activity requires a Hardship Policy. The Hardship Policy is attached.

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Lewiston Housing Authority MTW agency

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

This MTW activity requires an Impact Analysis. The Impact Analysis is attached.

Recertification Schedule is

Once every two years

Household may request 1 interim recertifications per year.

In these situations, Lewiston Housing will follow its current Administrative Plan and ACOP, which allow for interim examinations should there be a change in household composition or other circumstances that may adversely affect the family.

3.d. - Self-Certification of Assets (HCV)

Lewiston Housing will use its MTW Authority to revise the requirements for the verification, calculation, and inclusion of asset income at reexamination for public housing and Housing Choice programs. Verifying and calculating assets is time-consuming, and clients rarely have enough assets to impact the final rent determination. Only 0.4% of Housing Choice Voucher participants have assets greater than \$50,000, and the average assets for HCV residents are \$2023, which, when using the imputed interest rate, equals an annual income of \$1.23, which has no impact on the tenant portion of rent. The activity enables Lewiston Housing to utilize Federal expenditures more efficiently and results in cost and time savings for Lewiston Housing staff.

To streamline the recertification process, Lewiston Housing will:

- Self-Certification of Assets – Households can self-certify all assets when the household's combined value of assets is less than \$50,000.
- For households whose value of their assets is greater than \$50,000, asset verification is subject to standard HUD verification requirements.

This waiver will be replaced by the new HOTMA rule which will put this in effect 1/1/2024

This MTW activity serves the following statutory objectives:

Cost effectiveness

This MTW activity has the following cost implications:

Decreased expenditures

An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households.

The MTW activity applies to all assisted households

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

We submitted our FY22 MTW plan on March 1, 2023, and waiting for HUD approval at the time of writing. As such, we have not made any accomplishments.

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Lewiston Housing Authority MTW agency

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

The dollar threshold for the self-certification of assets is

\$50,000.

4.a. - Vacancy Loss (HCV-Tenant-based Assistance)

This activity is to incentivize and increase landlord participation in the HCV program. Lewiston Housing will pay up to one month's rent to a landlord whose unit was vacated by a participant of the Housing Choice Voucher program and is occupied by a different participant in the Housing Choice Voucher program. The amount paid will equal the contract rent paid for the vacating HCV participant, and payment will be made only after the execution of a new HAP contract. Should the apartment be vacant for less than one month, then the vacancy loss payment will be prorated based on the number of days the unit is vacant. Project-Based Vouchers, Mod Rehabs, and any other program that pays vacancy loss will be excluded from participation in this activity. Should the landlord be reimbursed for unpaid rent or vacancy by another source, including a security deposit, then that amount will be deducted from the total vacancy loss paid by Lewiston Housing. This activity will apply Emergency Housing Vouchers and Mainstream Vouchers that Lewiston Housing administers, as allowed by the specific specialty voucher.

This MTW activity serves the following statutory objectives:

Housing choice

This MTW activity has the following cost implications:

Increased expenditures

An MTW activity may apply to new admissions only, to currently assisted households only, or to both new admissions and currently assisted households.

The MTW activity applies to all assisted households

Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation.

We submitted our FY22 MTW plan on March 1, 2023, and waiting for HUD approval at the time of writing. As such, we have not made any accomplishments.

No hardship were requested in the most recent fiscal year.

In the prior year, under this activity, Lewiston Housing Authority MTW agency

Received 0 hardship requests

Approved hardship requests

Denied hardship requests

There is\are hardship requests pending.

This policy applies to

To all units

The types of units policy applies to:

Maximum payment to the landlord is

\$One month contract rent..

0 payments were issued under this policy y in the most recently completed PHA fiscal year.

\$0 issued under this policy in the most recently completed PHA fiscal year.



Hardship Policy for 3.a. & b. Alternative Reexamination Schedule for Households (PH & HCV)

The Lewiston Housing Hardship Policy is designed to address the following Moving to Work (MTW) initiatives:

- a) Alternative Reexamination Schedule for Households (PH)
- b) Alternative Reexamination Schedule for Households (HCV)

Lewiston Housing will use its MTW Authority to begin recertifying all clients in the Housing Choice Voucher Program (HCV) and the Public Housing Program (PH) on a biennial schedule. The documentation requirements for the recertification process are time-consuming and burdensome, and generally, tenant rents do not vary greatly from year to year. By moving to a biennial recertification schedule, Lewiston Housing will be able to reallocate staff time and talent to other program areas, and staff will have more time to ensure income reviews are accurate and thorough.

Families with an unadjusted income of 90 percent or more from fixed income sources will be exempt from this MTW activity. Lewiston Housing will follow guidelines as determined by the FAST Act of 2016.

Lewiston Housing will limit households to one interim recertification per year if the gross household income has decreased by 10% or more. Required interim recertifications (i.e., for changes in household composition or otherwise required by the agency) will not count against the limit.

In planning for waiver approval and the new process, Lewiston Housing has randomly divided the total number of HCV and PH households into two equal groups for biennial reexaminations beginning in FY2023. One group will be recertified between July 1, 2023, and June 30, 2024, and the other group will be recertified beginning July 1, 2024.

Financial hardship for an alternative reexamination schedule is for families that face housing instability due to a secondary annual decrease in income and if one of the following has occurred:

- The household has experienced a decrease in income because of changed circumstances, including loss or reduction of employment, death in the assisted household, or reduction in or loss of earnings or other assistance;
- The household has experienced an increase in expenses because of changed circumstances, for medical costs, childcare, transportation, education, or similar items; or
- The loss of income is through no fault of the household, the decrease is not due to a sanction on public assistance income, and the household verifies eligibility or ineligibility for unemployment benefits if the reduced income is due to loss of employment

Notification plan

The Alternative Reexamination Schedule for Households and hardship policy will be included in the ACOP and Administrative plan. A copy of this policy will be made available to all households at intake, recertification, and when assistance is to be terminated due to the MTW activity.

Requesting a Hardship

All hardship requests must be made in writing, stating the reason for the hardship, how the hardship has affected the household's ability to pay rent, the risk for housing instability, and the expected duration of families. Hardship requests should be emailed to info@lewistonhousing.org or mailed to Lewiston Housing, 86 Lisbon St, Lewiston, ME 04240. All hardship requests will be recorded and tracked in Lewiston Housing's project management software (Asana).

The MTW activity will be suspended beginning the next month after the request until Lewiston Housing has determined if the request is warranted. If it is determined that the hardship does not exist, the MTW activity will resume, and retroactive rent must be repaid either in full or through a reasonable repayment agreement.

If Lewiston Housing determines that a hardship exists, the household is exempt from the MTW activity as long as the hardship continues. The exemption will apply from the first of the month following the household's request until the later of the end of the qualifying hardship event or the household's next regularly scheduled reexamination.

Reasonable Accommodation

Persons with a disability may request a reasonable accommodation for a change to this policy or MTW activity. Reasonable accommodation requests must be made in writing and include documentation from a medical or healthcare provider that includes certification of the disability, the specific request, and the nexus between the disability and the request. Should the person with a disability need help to complete a reasonable accommodation request, they may reach out to any Lewiston Housing employee for a "Reasonable Accommodation of a Disability Request and Verification" form. Reasonable accommodation requests should be submitted to info@lewistonhousing.org or mailed to Lewiston Housing, 86 Lisbon St, Lewiston, ME 04240

Grievance Procedure

Should the hardship request be denied, the family has a right to a grievance hearing in accordance with Lewiston Housing's Grievance Procedure. A grievance hearing request must be made in writing within ten business days of receiving the adverse action. The request must specify the grounds upon which it is based and the action requested.



Impact Analysis for 3.a. & b. Alternative Reexamination Schedule for Households (PH & HCV)

This impact analysis describes the projected impact of the Safe Harbor waiver request related to allowing for an alternative reexamination schedule for households (PH & HCV).

1) Impact on the agency's finances:

Overall, we see a nominal change in a household income year after year. We anticipate that this policy change will encourage households to return to work due to the fewer required recertifications, leading to an overall reduction in HAP in the long run. We predict that this will be offset by the requirement to recertify households whose income drops due to unanticipated changes in income or composition.

Lewiston Housing projects overall agency savings associated with employees needing to recertify households less often. We anticipate this will save approximately 1FTE, which will allow for additional resources to direct elsewhere in the agency.

2) Impact on housing cost affordability:

Lewiston Housing does not anticipate that there will be a negative impact on housing costs for families. Households will have the opportunity to recertify should their income decrease by 10% or more and may request a hardship exemption should they be at risk of housing instability.

3) Impact on the waitlists:

Lewiston Housing does not anticipate that the proposed activity will have a measurable impact on the agency's waitlists, including the number of households on the waitlist and the amount of time families wait.

4) Impact on the termination rate:

Lewiston Housing does not anticipate that the proposed activity will have a measurable impact on the termination rate. There may be a slight reduction in terminations since households will be provided with the hardship exemption policy and can apply for a hardship exemption. Additionally, all households are notified of their right to a grievance hearing for any action that may be perceived as adverse.

5) Public housing occupancy level and voucher utilization

Lewiston Housing does not anticipate that the proposed activity will have a measurable impact the public housing occupancy level or voucher utilization rate.

6) Impact on MTW statutory goals of cost-effectiveness, self-sufficiency, and/or housing choice

Lewiston Housing anticipates that the alternative reexamination schedule for households will overall provide cost savings to Lewiston Housing due to fewer reexaminations being required and will streamline the process for applicants and households. Making this process more efficient will naturally improve cost-effectiveness.

Lewiston Housing also anticipates that adopting this waiver will allow for greater self-sufficiency. It will encourage households on a fixed income to return to work so they will have fewer reexaminations. Households will be encouraged to gain income as it could potentially not impact the tenant-paid portion of their rent in a two-year period.

7) The agency's ability to meet the five MTW statutory requirements

Implementing the alternative reexamination schedule for households will not prevent Lewiston Housing from meeting the five MTW statutory requirements. Lewiston Housing will comply with all MTW statutory requirements by participating in the MTW Demonstration.

8) The rate of hardship requests and the number granted and denied as a result of an MTW activity

As this is a new implementation, we anticipate an increase in hardship requests.

9) The impact, across the other eight factors, on protected classes, including disparate impact

Lewiston Housing does anticipate an impact on protected classes, including disparate impact.



Hardship Policy for 3.b. Payment Standards – Fair Market Rent (HCV)

The Lewiston Housing Hardship Policy is designed to address the following Moving to Work (MTW) initiatives:

- a) Payment Standards – Fair Market Rent (HCV) – Flexibility to increase payment standard to 120% of Fair Market Rents

Lewiston Housing will use its MTW Authority to maintain our payment standard at 120% of Fair Market Rents. Through the PIH Expediated Waiver process, we have previously received authorization to increase our Payment Standard to 120% of FMR. Through the MTW waiver request, we would like to continue this waiver which would otherwise expire on December 31, 2023. We are implementing this waiver to increase housing options for voucher holders. Rents continue to increase unprecedentedly, and vacancy rates remain at record lows. Our voucher utilization rate remains low. Returning to a lower Payment Standard would further reduce housing options for our voucher holders. We do not anticipate any cost implications as we are already at 120% FMR through the non-MTW waiver.

We do not anticipate this waiver would create a hardship for families as the payment standard would remain the same. Should it have a negative impact on a voucher participant, they may make a hardship request.

Notification plan

The hardship policy will be included in the ACOP and Administrative plan. A copy of this policy will be made available to all households at intake, recertification, and when assistance is to be terminated due to the MTW activity.

Requesting a Hardship

All hardship requests must be made in writing, stating the reason for the hardship, how the hardship has affected the household's ability to pay rent, the risk for housing instability, and the expected duration of families. Hardship requests should be emailed to info@lewistonhousing.org or mailed to Lewiston Housing, 86 Lisbon St, Lewiston, ME 04240. All hardship requests will be recorded and tracked in Lewiston Housing's project management software (Asana).

The MTW activity will be suspended beginning the next month after the request until Lewiston Housing has determined if the request is warranted. If it is determined that the hardship does not exist, the MTW activity will resume, and retroactive rent must be repaid either in full or through a reasonable repayment agreement.

If Lewiston Housing determines that a hardship exists, the household is exempt from the MTW activity as long as the hardship continues. The exemption will apply from the first of the month following the household's request until the later of the end of the qualifying hardship event or the household's next regularly scheduled reexamination.

Reasonable Accommodation

Persons with a disability may request a reasonable accommodation for a change to this policy or MTW activity. Reasonable accommodation requests must be made in writing and include documentation from a medical or healthcare provider that includes certification of the disability, the specific request, and the nexus between the disability and the request. Should the person with a disability need help to complete a reasonable accommodation request, they may reach out to any Lewiston Housing employee for a “Reasonable Accommodation of a Disability Request and Verification” form. Reasonable accommodation requests should be submitted to info@lewistonhousing.org or mailed to Lewiston Housing, 86 Lisbon St, Lewiston, ME 04240

Grievance Procedure

Should the hardship request be denied, the family has a right to a grievance hearing in accordance with Lewiston Housing’s Grievance Procedure. A grievance hearing request must be made in writing within ten business days of receiving the adverse action. The request must specify the grounds upon which it is based and the action requested.



Impact Analysis for 2.b. Payment Standards – FMR (HCV)

This impact analysis describes the projected impact of the Safe Harbor waiver request related to allowing for a change in payment standards for HCV program.

1) Impact on the agency's finances:

We do not anticipate an impact on the agency's finances as our payment standard is already at 120% FMR.

2) Impact on housing cost affordability:

Lewiston Housing does not anticipate that there will be a negative impact on housing costs for families.

3) Impact on the waitlists:

Lewiston Housing does not anticipate that the proposed activity will have a measurable impact on the agency's waitlists, including the number of households on the waitlist and the amount of time families wait.

4) Impact on the termination rate:

Lewiston Housing does not anticipate that the proposed activity will have a measurable impact on the termination rate.

5) Public housing occupancy level and voucher utilization

Lewiston Housing does not anticipate that the proposed activity will have a measurable impact on the public housing occupancy level or voucher utilization rate.

6) Impact on MTW statutory goals of cost-effectiveness, self-sufficiency, and/or housing choice

Lewiston Housing anticipates that this payment standard waiver will continue to increase housing choice to voucher participants by continuing a payment standard at 120% FMR.

7) The agency's ability to meet the five MTW statutory requirements

Implementing the alternative reexamination schedule for households will not prevent Lewiston Housing from meeting the five MTW statutory requirements. Lewiston Housing will comply with all MTW statutory requirements by participating in the MTW Demonstration.

8) The rate of hardship requests and the number granted and denied as a result of an MTW activity

As this is a new implementation, we anticipate an increase in hardship requests.

9) The impact, across the other eight factors, on protected classes, including disparate impact

Lewiston Housing does anticipate an impact on protected classes, including disparate impact.