

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: Amended 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.

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)	Will be Discontinued in the Submission Year
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	Plan to Implement in the Submission Year
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)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

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.

Which of the MTW statutory objectives does this MTW activity serve?

Housing choice

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Neutral (no cost implications)

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of 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 implementation

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

Please 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)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

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.

Which of the MTW statutory objectives does this MTW activity serve?

Cost effectiveness; Self-sufficiency

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Decreased revenue

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?

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

Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?

New admissions and currently assisted households

Does the MTW activity apply to all family types or only to selected family types?

The MTW activity applies only to selected family types

Please select the family types subject to this MTW activity.

Non-elderly, non-disabled families; Elderly families; Disabled families (to the extent those families are not exempt via a reasonable accommodation)

Does the MTW activity apply to all public housing developments?

The MTW activity applies to all developments

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 are still in early implementation, and there has been no impact on fiscal year goals.

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

What is the recertification schedule?

Once every two years

How many interim recertifications per year may a household request?

1

Please describe briefly how the MTW agency plans to address changes in family/household circumstances under the alternative reexamination schedule.

In these situations, Lewiston Housing will follow its current ACOP, which allows 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)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

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.

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Which of the MTW statutory objectives does this MTW activity serve?

Cost effectiveness; Self-sufficiency

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Decreased revenue

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of 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.

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.

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

What is the recertification schedule?

Once every two years

How many interim recertifications per year may a household request?

1

Please describe briefly how the MTW agency plans to address changes in family/household circumstances under the alternative reexamination schedule.

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

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

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW

activity contributes to a larger initiative

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.

Which of the MTW statutory objectives does this MTW activity serve?

Housing choice

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Increased expenditures

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of 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 are currently in early implementation and have not had accomplishments or changes.

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

Does this policy apply to certain types of units or to all units all HCV units or only certain types of units (for example, accessible units, units in a low-poverty neighborhood, or units/landlords new to the HCV program)?

To all units

What is the maximum payment that can be made to a landlord under this policy?

One month contract rent

How many payments were issued under this policy in the most recently completed PHA fiscal year?

0

What is the total dollar value of payments issued under this policy in the most recently completed PHA fiscal year?

\$0

5.a. - Pre-Qualifying Unit Inspections (HCV)**Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative**

This activity is to increase efficiency in operations and increase landlord participation.

A pre-inspection may be conducted within 90 days of the participant occupying the unit. Inspections may be conducted at any time during the 90 days, and previously conducted HQS inspections may be used.

The participant may request an interim inspection.

HQS inspection standards will not be altered as found at 24 C.F.R. 982.401.

Which of the MTW statutory objectives does this MTW activity serve?

Cost effectiveness; Housing choice

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Decreased expenditures

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of 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 have just begun implementation and do not have accomplishments or changes yet.

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

How long is the pre-inspection valid for?

The pre-inspection is valid for 90 days.

9.a. - Increase PBV Program Cap (HCV)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

Under this activity, Lewiston Housing plans to increase the number of authorized units that allow vouchers to be project-based to encourage development in underserved communities in Lewiston, Greene, Lisbon, Lisbon Falls, and Sabattus. Currently, there are not enough housing units available in Lewiston Housing's catchment area, and there is a need to create more housing opportunities for people who are at or below low income. Lewiston Housing plans to approve up to 50% of authorized HCV units to be project based.

Which of the MTW statutory objectives does this MTW activity serve?

Housing choice

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Neutral (no cost implications)

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of 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 have not yet implemented this waiver, no changes.

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

What percentage of total authorized HCV units will be authorized for project-basing?

50.00%

9.b. - Increase PBV Project Cap (HCV)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

Lewiston Housing may eliminate or raise the existing cap on the number of units within a project and allow up to 100% of units in a project to be placed under a PBV HAP contract. Lewiston Housing may eliminate or raise the project cap for those PBV Projects the agency determines to be consistent with increasing housing choice. This activity meets the goal of increasing housing choices and opportunities for people at or below low income.

Lewiston Housing is subject to Notice PIH 2013-27, where applicable, or its successor.

Which of the MTW statutory objectives does this MTW activity serve?

Housing choice

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Neutral (no cost implications)

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of 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 have not yet implemented this waiver, no changes

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

9.c. - Elimination of PBV Selection Process for PHA-owned Projects Without Improvement, Development, or Replacement (HCV)

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

Lewiston Housing will eliminate the selection process in awarding PBVs to properties owned by the agency that are not public housing without engaging in an initiative to improve, develop, or replace a public housing property or site. A subsidy layering review must be conducted. The agency must complete site selection requirements. An independent entity must perform HQS inspections according to 24 C.F.R. 983.59(b) or 24 C.F.R. 983.103(f). The agency is subject to Notice PIH 2013-27, where applicable, or successor. A single-asset entity of the agency must own property; see Notice PIH 2017-21.

This will help meet Lewiston Housing's goal to improve efficiency and cost-effectiveness, and increase housing choice.

Which of the MTW statutory objectives does this MTW activity serve?

Housing choice

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on

what you know today.

Decreased expenditures

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of 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 MTW plan on March 1, 2023, and received HUD approval on April 10, 2023. As such, we have not made any accomplishments while writing the new MTW annual plan. We are in the process of implementation.

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

17.a. - Rental Subsidy Programs

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

Lewiston Housing is proposing a Moving to Work activity for the remainder of the fiscal year 2024, concentrating on a rental subsidy program that uses non-traditional funds. Amidst Lewiston's escalating homelessness crisis, this proposal aims to maintain and potentially expand the operation of 37 shelter beds in a permanent indoor facility in the city. Our goal is two-fold: to provide a secure and reliable shelter for unhoused individuals and to create a central service center for people who are unhoused in Lewiston, a pioneering initiative in Androscoggin County.

The program plans to allocate the necessary funds towards maintaining the existing shelter beds and potentially creating new ones at \$100 per night per bed. The total funding, set to begin on October 1, 2023, establishes a subsidy rate of \$100 per bed per night. This is prorated for the period from October 1, 2023, to June 30, 2024, for 37 beds. This equals a total funding amount of approximately \$1,013,800 for these nine months. Given the current financial hardship faced by the target population, the tenant portion of the rent will be set at \$0, ensuring these shelters remain fully accessible for those in most need. All shelter guests utilizing this subsidy will be at low income or below. No more than 10% of our HAP budget will be spent on this activity.

In compliance with the provisions of PIH Notice 2011-45, we propose to distribute funds to local homeless service providers through a competitive process. All other requirements of PIH Notice 2011-45 will be followed.

Through this proposal, we seek to secure the necessary approval for this MTW activity. Our belief is firm: this targeted approach, dedicated to maintaining and potentially expanding shelter resources while considering the financial hardships of our city's most vulnerable citizens, forms an essential component of Lewiston's holistic response to homelessness. Creating a central service center is an innovative step in this direction, catering to the comprehensive needs of Lewiston's unhoused population.

Our goal is to create housing options for people experiencing homelessness while reducing the overall number of unhoused people in Lewiston.

Which of the MTW statutory objectives does this MTW activity serve?

Housing choice

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Increased expenditures

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of 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.

new implementation, no previous goals

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

Does the MTW activity apply to all LNT units/properties?

The MTW activity applies to specific units/properties

Describe which LNT units/properties participate in the MTW activity?

This activity is specific to emergency shelter beds created with this Local, Non-Traditional waiver;

Table 17.a.1 - For each third-party partner, please complete the information in the following table.

Third-party Partner	Type of Services the Partner Provides	# of Units Allocated to that Partner for the Fiscal Year
TBD through competitive process	shelter services, resource coordination for guests, day to day operations,	37.00

17.c. - Housing Development Programs

Describe the MTW activity, the MTW agency's goal(s) for the MTW activity, and, if applicable, how the MTW activity contributes to a larger initiative

We are proposing the use of funds for two new developments. Both will be LIHTC developments with Project Based Vouchers.

1) Martel School Apartments will be at least two phases of senior housing comprising a total of 69 units (36 units in Phase 1 and 33 units in Phase 2). All units will be designed at 60% of AMI and 50% of AMI, and project-based voucher units will be available. We intend to allocate \$400,000 toward the development of the parcel. This would involve site preparation and demolition of the existing school building, which has exceeded its usefulness and lifespan. All requirements of PIH Notice 2011-45 and section 30 of the 1937 Housing Act will be followed. MTW Funding awarded to a third-party provider must be competitively bid. We do not intend to use HAP funding.

2) Dewitt Phase 2 will be a mixed-use property with commercial space in the heart of Lewiston's downtown district. The property will use LIHTC, NMTC, and PBVs and all units will be at 60% and 50% AMI. This is on the same block as our Choice Neighborhoods' Dewitt Property, which is mixed-income with commercial. A pro rata calculation will use to determine the number of affordable units at or below low income, which we anticipate exceeding. Our plan to is to create a model block for the city of Lewiston. All requirements of PIH Notice 2011-45 and section 30 of the 1937 Housing Act will be followed. MTW Funding awarded to a third-party provider must be competitively bid. We do not intend to use HAP funding.

Which of the MTW statutory objectives does this MTW activity serve?

Housing choice

What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.

Increased revenue; Increased expenditures

Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of 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.

New implementations

Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?

No

Table 17.c.1 - Housing Development Programs that the MTW Agency plans to commit Funds to in Fiscal Year

Name of Development and Address	MTW Role: Acquisition, Rehabilitation, New Construction?	Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other	Number of Affordable Units	Total Number of Units	Number of Units by Affordability - 80% of AMI	Number of Units by Affordability - 50% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other
Martel School Apartments	New Construction	LIHTC, PBV *Other units are 60% AMI	69.00	69.00	0.00	27.00	0.00	42.00
Dewitt Phase 2	Rehabilitation, New Construction	LIHTC, NMTC, PBV *Other units are 60% AMI	200.00	200.00	0.00	80.00	0.00	120.00

Housing Development Programs that the MTW Agency plans to spend funds on in the Fiscal Year

Name of Development and Address	MTW Role: Acquisition, Rehabilitation, New Construction?	Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other	Number of Affordable Units	Total Number of Units	Number of Units by Affordability - 80% of AMI	Number of Units by Affordability - 50% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other
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Table 17.c.2 - Housing Development Programs that the MTW Agency committed funds to in prior Fiscal Year

Name of Development and Address	MTW Role: Acquisition, Rehabilitation, New Construction?	Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other	Number of Affordable Units	Total Number of Units	Number of Units by Affordability - 80% of AMI	Number of Units by Affordability - 50% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other
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Housing Development Programs that the MTW Agency spent funds on in prior Fiscal Year

Name of Development and Address	MTW Role: Acquisition, Rehabilitation, New Construction?	Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other	Number of Affordable Units	Total Number of Units	Number of Units by Affordability - 80% of AMI	Number of Units by Affordability - 50% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other
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D.	Safe Harbor Waivers.
D.1	<p>Will the MTW agency submit request for approval of a Safe Harbor Waiver this year?</p> <p>No Safe Harbor Waivers are being requested.</p>

E.	Agency-Specific Waiver(s).
E.1	<p>Agency-Specific Waiver(s) for HUD Approval:</p> <p>The MTW demonstration program is intended to foster innovation and HUD encourages MTW agencies, in consultation with their residents and stakeholders, to be creative in their approach to solving affordable housing issues facing their local communities. For this reason, flexibilities beyond those provided for in Appendix I may be needed. Agency-Specific Waivers may be requested if an MTW agency wishes to implement additional activities, or waive a statutory and/or regulatory requirement not included in Appendix I.</p> <p>In order to pursue an Agency-Specific Waiver, an MTW agency must include an Agency-Specific Waiver request, an impact analysis, and a hardship policy (as applicable), and respond to all of the mandatory core questions as applicable.</p> <p>For each Agency-Specific Waiver(s) request, please upload supporting documentation, that includes: a) a full description of the activity, including what the agency is proposing to waive (i.e., statute, regulation, and/or Operations Notice), b) how the initiative achieves one or more of the 3 MTW statutory objectives, c) a description of which population groups and household types that will be impacted by this activity, d) any cost implications associated with the activity, e) an implementation timeline for the initiative, f) an impact analysis, g) a description of the hardship policy for the initiative, and h) a copy of all comments received at the public hearing along with the MTW agency's description of how the comments were considered, as a required attachment to the MTW Supplement.</p> <p>Will the MTW agency submit a request for approval of an Agency-Specific Waiver this year?</p> <p>No Agency-Specific Waivers are being requested.</p>
E.2	<p>Agency-Specific Waiver(s) for which HUD Approval has been Received:</p> <p>Does the MTW agency have any approved Agency-Specific Waivers?</p> <p>MTW Agency does not have approved Agency-Specific Waivers</p>

F.	Public Housing Operating Subsidy Grant Reporting.
F.1	Total Public Housing Operating subsidy amount authorized, disbursed by 9/30, remaining, and deadline for disbursement, by Federal Fiscal Year for each year the PHA is designated an MTW agency.

Federal Fiscal Year (FFY)	Total Operating Subsidy Authorized Amount	How Much PHA Disbursed by the 9/30 Reporting Period	Remaining Not Yet Disbursed	Deadline
2021	\$1,541,900	\$1,541,900	\$0	2029-09-30
2022	\$1,642,620	\$1,642,620	\$0	2030-09-30
2023	\$678,407	\$407,044	\$271,363	2031-09-30

G.	MTW Statutory Requirements.	
G.1	75% Very Low Income – Local, Non-Traditional. HUD will verify compliance with the statutory requirement that at least 75% of the households assisted by the MTW agency are very low-income for MTW public housing units and MTW HCVs through HUD systems. The MTW PHA must provide data for the actual families housed upon admission during the PHA's most recently completed Fiscal Year for its Local, Non-Traditional program households.	
	Income Level	Number of Local, Non-Traditional Households Admitted in the Fiscal Year*
	80%-50% Area Median Income	0
	49%-30% Area Median Income	0
	Below 30% Area Median Income	0
	Total Local, Non-Traditional Households	0

*Local, non-traditional income data must be provided in the MTW Supplement form until such time that it can be submitted in IMS-PIC or other HUD system.

G.2	Establishing Reasonable Rent Policy.
Has the MTW agency established a rent reform policy to encourage employment and self-sufficiency? Yes	

G.3	Substantially the Same (STS) – Local, Non-Traditional.
The total number of unit months that families were housed in a local, non-traditional rental subsidy for the prior full calendar year.	0 # of unit months
The total number of unit months that families were housed in a local, non-traditional housing development program for the prior full calendar year.	0 # of unit months

Number of units developed under the local, non-traditional housing development activity that were available for occupancy during the prior full calendar year:

PROPERTY NAME/ ADDRESS	0/1 BR	2 BR	3 BR	4 BR	5 BR	6+ BR	TOTAL UNITS	POPULATION TYPE*	if 'Population Type' is Other	# of Section 504 Accessible (Mobility)**	# of Section 504 Accessible (Hearing/ Vision)	Was this Property Made Available for Initial Occupancy during the Prior Full Calendar Year?	What was the Total Amount of MTW Funds Invested into the Property?
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G.4	Comparable Mix (by Family Size) – Local, Non-Traditional.
To demonstrate compliance with the statutory requirement to continue serving a 'comparable mix' of families by family size to that which would have been served without MTW, the MTW agency will provide the number of families occupying local, non-traditional units by household size for the most recently completed Fiscal Year in the provided table.	

Family Size:	Occupied Number of Local, Non-Traditional units by Household Size
1 Person	0
2 Person	0
3 Person	0
4 Person	0
5 Person	0
6+ Person	0
Totals	0

H.	Public Comment
Attached you will find a copy of all of the comments received and a description of how the agency analyzed the comments, as well as any decisions made based on those comments.	

I.	Evaluations.