



Moving to Work (MTW) Initial Supplement to PHA Annual Plan Public Notice

Date of Publication: February 23, 2024

To: All Interested Agencies, Groups, and Individuals:

Lewiston Housing requests public review and comments on Lewiston Housing's Moving to Work (MTW) Initial Supplement of the Annual PHA Plan for July 1, 2024 – June 30, 2025. The public comment period will extend from February 23, 2024, to April 8, 2024.

During the public comment period, Lewiston Housing residents, program participants, landlords, and the general public are invited to participate in a public meeting to review the MTW Supplement, ask questions, and submit comments. If you have a disability and require an alternative form of communication, please submit your request 48 hours before the meeting date(s) to theynen@lewistonhousing.org or 207-783-1423.

Meeting 1: March 11, 2024, 2 pm – 3 pm
Please follow the link below to join the webinar:
<https://lewistonhousing.org/mtw2025>

Or Telephone:
1 (646) 558-8656 Webinar ID: 876 2257 9760

Meeting 2: March 18, 2024, 2 pm – 3 pm
86 Lisbon Street
Lewiston, ME 04240

Following the public comment period, Lewiston Housing residents, program participants, and members of the general public are invited to participate in a public hearing to review the MTW Supplement:

Final Public Meeting: Tuesday, April 9, 2024, 1 pm
86 Lisbon St, Lewiston, ME 04240

Lewiston Housing will consider all comments received during the public comment period and at the public hearings. It may modify the MTW Supplement and related materials in response to public comments. The Lewiston Housing Board of Commissioners will meet to vote on the MTW Supplement of the Annual PHA Plan on or after April 10, 2024. A separate public notice will be posted prior to this meeting.

The MTW Supplement to the Annual PHA Plan and related documents are available for review by request and may be downloaded at: <https://lewistonhousing.org/mtw2025>

All written comments or questions should be sent by email to theynen@lewistonhousing.org or mail to Lewiston Housing, attn: Travis Heynen, PO Box 361, Lewiston, ME 04243. Written comments must be received by the close of the public comment period.

PHA Name : Lewiston Housing Authority

PHA Code : ME005

MTW Supplement for PHA Fiscal Year Beginning : (MM/DD/YYYY): 7/1/2025

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.c. Self-Certification of Assets (PH)
- 3.d. Self-Certification of Assets (HCV)
- 5.a. Pre-Qualifying Unit Inspections (HCV)
- Agency Specific Waiver - Elimination of PBV Selection Process for Projects owned by Local Nonprofit Developers (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.a. Payment Standards – Small Area Fair Market Rents (HCV)
- 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)
- 17.a. Rental Subsidy Programs

17.c. Housing Development Programs

Agency Specific Waiver - Elimination of PBV Selection Process for Projects owned by Local Nonprofit Developers (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 2.a, 2.b, 9.a., 9.b., 9.c., 17.a, 17.c will allow Lewiston Housing to create new housing opportunities that do not currently exist in Lewiston for low-income families.

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)	Plan to Implement in the Submission Year
b. Payment Standards- Fair Market Rents (HCV)	Currently Implementing
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)	Currently Implementing
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	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.a. - Payment Standards- Small Area Fair Market Rents (HCV)
<p>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</p> <p>We are proposing to combine Small Area Fair Market Rents for zip codes 04240 and 04250. This would be for new project-based voucher (PBV) contracts effective July 1, 2024, or after. PBV contracts would still need to meet all other rent-setting requirements. The payment standard would be set up to 150% of the combined SAFMR. There is little geographical difference between the two zip codes, and the markets are very similar. These are both expansion areas for new developments.</p>
<p>Which of the MTW statutory objectives does this MTW activity serve?</p> <p>Housing choice</p>
<p>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</p> <p>Neutral (no cost implications)</p>
<p>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</p> <p>The MTW activity applies to all assisted households</p>
<p>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.</p> <p>n/a - new implementation</p>
<p>Does this MTW activity require a hardship policy?</p> <p>Yes</p> <p>This document is attached.</p>
<p>Does the hardship policy apply to more than this MTW activity?</p> <p>No</p>
<p>Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?</p> <p>No</p>
<p>How many hardship requests have been received associated with this activity in the past year?</p> <p>No hardship were requested in the most recent fiscal year.</p>
<p>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</p> <p>No</p>
<p>Does the MTW activity require an impact analysis?</p> <p>Yes</p>

This document is attached.

Does the impact analysis apply to more than this MTW activity?

No

Please explain the payment standards by ZIP code or "grouped" ZIP codes:

The average of the grouped SAFMR zip codes will be used as the base SAFMR. The payment standard will be based on up to 150% of the SAFMR.

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 continued this waiver, which would otherwise have expired 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. Our goal for the next year is to increase voucher utilization.

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.

There was no significant change in policy due to previously having a waiver in place for our payment standard to standard to be at 120% of FMR. Our voucher utilization decreased over the past year. This is due to an unprecedented housing shortage in our jurisdiction and a reclassification of some HCVs.

Does this MTW activity require a hardship policy?

Yes

This document is attached.

Does the hardship policy apply to more than this MTW activity?

No

Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?

No

How many hardship requests have been received associated with this activity in the past year?

No hardship were requested in the most recent fiscal year.

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

No

Does the MTW activity require an impact analysis?

Yes

This document is attached.

Does the impact analysis apply to more than this MTW activity?

No

Please explain the payment standards by FMR:

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.

In our original MTW waiver, we excluded families with an unadjusted income of 90 percent or more from fixed income sources. We chose to follow guidelines as determined by the FAST Act of 2016 for these households. This has proven to be administratively burdensome and has required additional quality assurance resources. To create greater efficiency, we are changing this waiver to include all households.

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.

Lewiston Housing has randomly divided the total number of HCV and PH households into two equal groups for biennial examinations. We implemented this waiver with annual certifications effective January 1, 2024, and after.

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 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 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 to all family types

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.

After careful planning, we started conducting biannual recertification with annuals effective January 1, 2024. At the time of writing this plan, it is too early to determine significant outcomes and accomplishments. Previously, we excluded households on fixed incomes, but this has proven to be administratively burdensome and has created confusion for frontline employees. To simplify and create greater efficiency, we are modifying this waiver to include fixed-income households.

Does this MTW activity require a hardship policy?

Yes

This document is attached.

Does the hardship policy apply to more than this MTW activity?

Yes

Please list all of the applicable MTW activities. (Only upload hardship policy once when said policy applies to multiple MTW activities.)

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

Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?

Yes

What considerations led the MTW agency to modify the hardship policy?

We modified the hardship policy to include fixed-income households and modified language for clarity.

How many hardship requests have been received associated with this activity in the past year?

No hardship were requested in the most recent fiscal year.

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

No

Does the MTW activity require an impact analysis?

Yes

This document is attached.

Does the impact analysis apply to more than this MTW activity?

Yes

Please list all of the applicable MTW activities. (Only upload impact analysis once when said impact analysis applies to multiple MTW activities.)
 3.a. - Alternative Reexamination Schedule for Households (PH); 3.b. - Alternative Reexamination Schedule for Households (HCV)

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 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)

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.

In our original MTW waiver, we excluded families with an unadjusted income of 90 percent or more from fixed income sources. We chose to follow guidelines as determined by the FAST Act of 2016 for these households. This has proven to be administratively burdensome and has required additional quality assurance resources. To create greater efficiency, we are changing this waiver to include all households.

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.

Lewiston Housing has randomly divided the total number of HCV and PH households into two equal groups for biennial examinations. We implemented this waiver with annual certifications effective January 1, 2024, and after.

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 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.
 After careful planning, we started conducting biannual recertification with annuals effective January 1, 2024. At the time of

writing this plan, it is too early to determine significant outcomes and accomplishments. Previously, we excluded households on fixed incomes, but this has proven to be administratively burdensome and has created confusion for frontline employees. To simplify and create greater efficiency, we are modifying this waiver to include fixed-income households.

Does this MTW activity require a hardship policy?

Yes

This document is attached.

Does the hardship policy apply to more than this MTW activity?

Yes

Please list all of the applicable MTW activities. (Only upload hardship policy once when said policy applies to multiple MTW activities.)

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

Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?

Yes

What considerations led the MTW agency to modify the hardship policy?

Modified for clarity and added in fixed-income households.

How many hardship requests have been received associated with this activity in the past year?

No hardship were requested in the most recent fiscal year.

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

No

Does the MTW activity require an impact analysis?

Yes

This document is attached.

Does the impact analysis apply to more than this MTW activity?

Yes

Please list all of the applicable MTW activities. (Only upload impact analysis once when said impact analysis applies to multiple MTW activities.)

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

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 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.c. - Self-Certification of Assets (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 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 2.6% of Public Housing residents have assets greater than \$50,000, and the average assets for residents are \$6838, which, when using the imputed interest rate, equals an annual income of \$4.10, which has no impact on the family's 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.

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

Cost effectiveness

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 implemented this waiver immediately following the approval of our last MTW Annual Plan. It has been well received and has created greater efficiency.

Does the hardship policy apply to more than this MTW activity?

No

Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?

No

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

No

Does the impact analysis apply to more than this MTW activity?

No

Please state the dollar threshold for the self-certification of assets.

\$50,000.

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

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

Cost effectiveness

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 implemented this waiver immediately following the approval of our last MTW Annual Plan. It has been well received and has created greater efficiency.

Does the hardship policy apply to more than this MTW activity?

No

Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?

No

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

No

Does the impact analysis apply to more than this MTW activity?

No

Please state the dollar threshold for the self-certification of assets.

\$50,000.

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 to 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.

Lewiston Housing currently has a landlord incentive program in place funded by the Maine State Housing Authority that includes incentive payments, damage repairs, and security deposit payments. As we currently have an incentive program in place, it was simple to add the vacancy loss incentive to our existing marketing materials and website.

We have had six requests for vacancy loss from landlords totaling \$7,691 since implementing this waiver in Spring 2023. While this is a small amount, it is in line with the number of damage claims we have received from our other incentive program.

While utilization of this waiver by landlords is low, we see the most value in this waiver as a marketing tool to attract new landlords.

Does the hardship policy apply to more than this MTW activity?

No

Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?

No

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

No

Does the impact analysis apply to more than this MTW activity?

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?
3
What is the total dollar value of payments issued under this policy in the most recently completed PHA fiscal year?
\$4,300

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 not had success with this waiver and have done zero pre-inspections. More employee training and tracking is required for this waiver to be successful.
Does the hardship policy apply to more than this MTW activity?
No
Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?
No

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

No

Does the impact analysis apply to more than this MTW activity?

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.

While this waiver is in effect, we have not yet needed to utilize it.

Does the hardship policy apply to more than this MTW activity?

No

Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?

No

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

No

Does the impact analysis apply to more than this MTW activity?

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.

While we have this waiver in place, we have not needed to utilize it this fiscal year.

Does the hardship policy apply to more than this MTW activity?

No

Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?

No

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

No

Does the impact analysis apply to more than this MTW activity?

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.

While we have this waiver in place, we have not needed to utilize it this fiscal year.

Does the hardship policy apply to more than this MTW activity?

No

Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?

No

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

No

Does the impact analysis apply to more than this MTW activity?

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

Our current waiver in place is 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.

Due to the political environment in Lewiston, we were unable to implement this waiver. The political environment has since changed with a new city council as of this calendar year. Our hope is working with the city council, we will be able to implement this waiver this fiscal year.

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
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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.

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 \$800,000 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.

- 1) For Martel, we have a 4% LIHTC application and are waiting for approval from MaineHousing. We have a contractor lined up for site work and working with HUD to submit the necessary DORC and legal documents so that we can access funds for site preparation work.
- 2) Dewitt Phase 2 is currently in early development. We have had community stakeholder meetings and have begun working with an architect on design. We do not need to access MTW funding flexibility in this fiscal year, but we anticipate we will soon.

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
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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
Martel School Apartments	New Construction	Gap Financing, Tax Credit Partnership	69.00	69.00	0.00	27.00	0.00	42.00
DeWitt Phase 2	Rehabilitation, New Construction	Gap Financing, Tax Credit Partnership	200.00	0.00	0.00	80.00	0.00	120.00

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>Yes, the Agency-Specific Waiver request is attached.</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
2024				

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.
	Please see attached for an additional public hearing held for Agency-Specific Waiver(s) and/or Safe Harbor Waiver(s)

I.	Evaluations.
	Yes - This table lists evaluations of Lewiston Housing Authority's MTW activities, including the names of evaluators and available reports

Table I.1 - Evaluations of MTW Policies

Title and short description	Evaluator name and contact information	Time period	Reports available
ABT Associates, Landlord Incentive Cohort Evaluation	Hannah Thomas, Ph.D. Qualitative and Mixed Methods Client Solutions Architect, Principal Abt Associates 10 Fawcett Street Cambridge, MA 02138 O: 617-520-2632 Cell: 207-409-3615 F: 617-386-7642 www.abtassociates.com		none



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 – Small Area Fair Market Rents (HCV)**

Lewiston Housing will use its MTW Authority to combine Small Area Fair Market Rents for zip codes 04240 and 04250. This would be for new project-based voucher (PBV) contracts effective July 1, 2024, or after. PBV contracts would still need to meet all other rent-setting requirements. The payment standard would be set up to 150% of the combined SAFMR. There is little geographical difference between the two zip codes, and the markets are very similar. These are both expansion areas for new developments.

We do not anticipate this waiver would create a hardship for families this would be for new PBV contracts that are not currently in effect. 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 potentially impacted 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.a. - Payment Standards- Small Area Fair Market Rents (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 a measurable impact on the agency's finances as this will only affect a very small percentage of vouchers.

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. We do anticipate an increase in our voucher utilization rate due to more housing opportunity and availability.

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 people seeking affordable housing.

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

Implementing this waiver 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 this waiver 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.



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

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

Under the authority granted to Lewiston Housing as a Moving-to-Work (MTW) PHA, Lewiston Housing will conduct reexaminations of family income and composition at least biennially.

If a family reports a change it was not required to report that would result in a decrease in the family share of the rent, Lewiston Housing will conduct an interim reexamination only if the family's annual income has decreased by ten percent or more. Lewiston Housing will not conduct an interim if the decrease is less than ten percent of annual income. If a subsequent decrease results in a cumulative income decrease of 10% or more of annual income as last reported to HUD, Lewiston Housing will conduct an interim. See Section 11-II.D. for effective dates.

Lewiston Housing will only conduct one interim for income decrease(s) per family in any twelve-month period.

If this policy creates a hardship for a family, the family may request a hardship exemption.

Lewiston Housing Defined Financial Hardship

Financial hardship for an alternative reexamination schedule is for families that face housing instability due to a second annual decrease in income. In order to qualify, one of the following situations must have 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; and
- 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.

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Requesting a Hardship

All hardship requests must be written, state the reason(s) for the hardship, explain how the hardship has affected the household's ability to pay rent, present the risk for housing instability, and the expected duration. Hardship requests should be emailed to info@lewistonhousing.org or mailed to Lewiston Housing, PO Box 361, Lewiston, ME 04243. All hardship requests will be recorded and tracked in Lewiston Housing's project management software.

Hardship Determination and Processing

The MTW activity will be suspended beginning the month after the month in which the request was made. Lewiston Housing will promptly determine whether the family qualifies for a hardship exemption.

If Lewiston Housing determines that no qualifying hardship exists, Lewiston Housing will reinstate the MTW activity retroactively. The family will be required to repay any amounts due. The family may be offered a reasonable repayment agreement.

If Lewiston Housing determines that a qualifying hardship exists, the family is exempt from the MTW activity as long as the hardship continues. The exemption will apply from the first of the month following the date the family's written request was received until the first of the month following the date the hardship no longer exists or the effective date of the family's next regularly scheduled reexamination, whichever is sooner.

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 contact 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, PO Box 361, Lewiston, ME 04243.

Grievance Procedure

Should the hardship request be denied, the family has a right to an informal hearing in accordance with Lewiston Housing's Informal Hearing Procedure. An informal hearing request must be made in writing within ten business days of receiving the notice that the request for a hardship exemption was denied. The request must specify the grounds upon which it is based and the action requested. The family may request an explanation of why the request was denied.



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.



Agency Specific Moving to Work (MTW) Waiver: Elimination of PBV Selection Process for Projects owned by Local Nonprofit Developers (HCV)

This Agency Specific Waiver will eliminate the selection process in the award of PBVs to properties owned by a local nonprofit developer. The nonprofit organization's headquarters must be based in Lewiston Housing's catchment area and have been awarded a project-based voucher (PBV) contract within the past five years. The nonprofit organization's existing PBV contract(s) must be in good standing, as determined by Lewiston Housing.

Elimination of PBV Selection Process (HCV): Certain provisions of 24 C.F.R. 983.51 as it was superseded by HOTMA Implementation Notices at 82 FR 5458 and 82 FR 32461 (see implementation guidance in Notice PIH 2017-21).

This initiative achieves greater housing choice opportunities and cost effectiveness.

No specific population groups and household types that will be impacted by this activity. All population groups and household types will be impacted equally.

There are no cost implications associated with the activity.

The timeline for this initiative would begin immediately upon waiver approval.

A hardship policy is not required for this initiative.

Impact Analysis:

1) Impact on the agency's finances:

We do not anticipate an impact on the agency's finances.

2) Impact on housing cost affordability:

Lewiston Housing does not anticipate that there will be a negative impact on housing costs for families. This waiver would streamline PBV award process, allowing for the allocation of PBV resources more quickly to serve more 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 or 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. We anticipate this will increase our 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 eligible families as the allocation of PBV contracts will be streamlined and made available more quickly. Cost-effectiveness will improve as we will eliminate administrative processes in awarding PBV contracts.

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

Implementing this waiver 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:

Hardship requests are not applicable to this waiver.

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.