



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

Date of Publication: September 30, 2024

To: All Interested Agencies, Groups, and Individuals:

Lewiston Housing requests public review and comments on Lewiston Housing's Moving to Work (MTW) Amended Supplement of the Annual PHA Plan for July 1, 2024 – June 30, 2025. The public comment period will extend from September 30 – November 14, 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: October 7, 2024, 1 pm – 2 pm
Please follow the link below to join the webinar:
<https://lewistonhousing.org/mtw2025DRA>
Or Telephone:

Meeting 2: October 21, 2024, 1 pm – 2 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: Friday, November 15, 2024, 9 am – 10 am
Please follow the link below to join the webinar: <https://lewistonhousing.org/mtw2025DRA>
Or Telephone:

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 November 15, 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/mtw2025DRA>

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: Amended Annual Submission

B. MTW Supplement Narrative.

Lewiston Housing was selected through a rigorous application process as a Moving to Work (MTW) organization during the 25th anniversary of the MTW Demonstration Program. First authorized by Congress in 1996, MTW allows public housing authorities (PHAs) to redefine their operations by granting them the flexibility to implement innovative and creative solutions to community needs. MTW encourages an entrepreneurial approach, enabling PHAs to pioneer innovative policy interventions at the local level, which are often later adopted nationally. Examples include less frequent recertifications for those on a fixed income, increased payment standards for accommodating persons with disabilities, and site-based waiting lists for project-based vouchers.

Lewiston Housing aims to further MTW's statutory objectives of reducing costs, enhancing self-sufficiency incentives and services for residents, and increasing housing choice through various MTW waivers and initiatives. With MTW funding and regulatory flexibility, Lewiston Housing (LHA) strives to operate efficiently and effectively, stretching limited public dollars to meet the growing needs of the low-income population in Lewiston, Maine. As a HUD High-performer, LHA will leverage its creativity and strengths in real estate management to address the community's affordable housing needs amid increasing demand for quality housing.

Through the MTW program, Lewiston Housing can tackle significant housing challenges in the region. Real Estate Market Assessment (MA) analyses from 2020 and 2021 show an 18% to 21% increase in rents for 1-, 2-, and 3-bedroom units within one year, with these units now at 121% to 126% of the Fair Market Rent (FMR). The assessment indicates a rental vacancy rate of 2.2% in Androscoggin County, less than half the 5% rate typically associated with normal turnover, limiting renters' choices. The vacancy rate in Lewiston is even lower, as low-income in-migrating families face market rents that do not support new construction or renovation of additional units. Furthermore, the MA reported that most affordable and mixed-income properties are fully occupied, with 100% occupancy.

Public consulting and gap analysis conducted by the Auburn Lewiston HOME Consortium (completed September 2022 for the HOME-ARP Plan amendment) confirmed these market demands. They highlighted rising rent and household expenses, along with a low number of affordable housing units expected to come online, potentially increasing the number 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 from Africa and the Middle East, as well as other Maine families priced out of the Portland and coastal regional housing markets. This trend is expected to continue.

Lewiston Housing's 2025 MTW plan was conditionally approved, with all activities approved except for the proposed agency-specific waiver that aimed to eliminate the project-based voucher (PBV) selection process for local nonprofit developers. After discussions with HUD's MTW office, it was determined that similar efficiencies could be achieved by adopting waiver 9.d, the Alternative PBV Selection Process. The purpose of this amended MTW plan is to remove the agency-specific waiver and adopt waiver 9.d. This will allow for an increase in housing choices for low-income families and reduce administrative costs.

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)
- 9.d Alternative PBV Selection Process

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)
- 9.d Alternative PBV Selection Process
- 17.a Rental Subsidy Programs
- 17.c. Housing Development Programs

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.

This FY25 Amended Plan introduces a new Limited Non-Traditional (LNT) waiver for a Direct Rental Assistance pilot program.

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)	Currently Implementing
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 propose combining Small Area Fair Market Rents for zip codes 04240 and 04250. This would be for new project-based voucher (PBV) contracts only 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. The two zip codes have little geographical difference, and the markets are very similar. These are both expansion areas for new housing 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> <p>This document is attached.</p>

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 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?

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?

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?

Provided Already

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?

Provided Already

What is the recertification schedule?

Once every two years

How many interim recertifications per year may a household request?

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

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

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 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?

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 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.

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

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.

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

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 Page 18 of 25 form HUD-50075-MTW (01/2021)

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

No

9.d. - Alternative PBV Selection Process (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 select Project Based Voucher (PBV) proposals using an alternative selection process to award PBVs owned by non-profit agencies that are not public housing. This activity enables Lewiston Housing to select PBV proposals without conducting a competitive selection process where: 1) the proposed project was previously selected for award through any form of open public solicitation or invitation process conducted by a Federal, State, or local government entity, where a proposal is selected subject to funding availability; and 2) the other government entity selected the proposed project within the last fifteen years. This activity also eliminates the regulatory requirement that the previous selection process not consider rental assistance for the proposed project and allows proposers to include PBV assistance in their calculations.

Specific safe harbors include:

i. If the selected project is PHA-owned, HQS inspections must be performed by an independent entity according to 24 C.F.R. 983.59(b) or 24 C.F.R. 983.103(f).*

ii. The agency is subject to Notice PIH 2013-27, where applicable, or successor.*

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.

This is a newly proposed waiver. Our goal going forward would be to increase housing opportunities by issuing more PBVs in a streamlined manner.

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

Emergency shelter: 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.

Direct Rental Assistance pilot:

Executive Summary

The Direct Rental Assistance (DRA) pilot program seeks to explore an innovative approach to rental assistance by providing subsidies directly to tenants rather than landlords. This shift addresses existing challenges within the Housing Choice Voucher (HCV) program by empowering tenants and simplifying administrative processes for Lewiston Housing. By transferring the responsibility of rental payments to tenants, the program fosters a more equitable and efficient system of rental assistance. This approach is designed to promote greater autonomy and housing choice, enabling families to secure housing in a broader range of neighborhoods and helping to alleviate the concentration of low-income households in high-poverty areas. Additionally, by reducing the need for direct landlord engagement and associated administrative tasks, the DRA initiative decreases operational complexity and the stigma often associated with traditional voucher programs.

This initiative aligns with all three of the Moving to Work (MTW) statutory objectives: enhancing cost-effectiveness in federal expenditures, promoting self-sufficiency among low-income families, and increasing housing choices for these families.

Cost Effectiveness:

- By paying subsidies directly to tenants, Lewiston Housing reduces the administrative burden associated with managing landlord contracts and payments.
- DRA eliminates the need for ongoing and extensive landlord engagement and outreach.
- Reducing landlord related administrative tasks leads to cost savings for Lewiston Housing.

Self-Sufficiency:

- The DRA program empowers tenants to make financial decisions for themselves, fostering a sense of responsibility and independence. By managing their own rental payments, tenants are encouraged to develop the skills needed to maintain long-term housing stability and financial independence.

Housing Choice:

- Simplifying the process for landlords encourages broader participation in the program and increases the housing options available to tenants.
- Making the subsidy directly available to tenants allows them to choose from a broader range of housing options, including those in low-poverty areas, thereby promoting economic mobility and diversity in housing choices.

By allowing tenants to manage their rental payments directly, the program encourages responsible financial behavior and empowers tenants to make informed housing decisions. This approach could lead to a significant transformation in how federal housing assistance is distributed, offering a model more responsive to the needs of low-income families.

In addition to the HAP flexibility allowed by the Limited Non-Traditional (LNT) waiver, Lewiston Housing is requesting to

waive the (see attached)

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

Cost effectiveness; Self-sufficiency; 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.

Lewiston Housing Direct Rental Assistance Pilot Program Proposal

Executive Summary

The Direct Rental Assistance (DRA) pilot program seeks to explore an innovative approach to rental assistance by providing subsidies directly to tenants rather than landlords. This shift addresses existing challenges within the Housing Choice Voucher (HCV) program by empowering tenants and simplifying administrative processes for Lewiston Housing.

By transferring the responsibility of rental payments to tenants, the program fosters a more equitable and efficient system of rental assistance. This approach is designed to promote greater autonomy and housing choice, enabling families to secure housing in a broader range of neighborhoods and helping to alleviate the concentration of low-income households in high-poverty areas. Additionally, by reducing the need for direct landlord engagement and associated administrative tasks, the DRA initiative decreases operational complexity and the stigma often associated with traditional voucher programs.

This initiative aligns with all three of the Moving to Work (MTW) statutory objectives: enhancing cost-effectiveness in federal expenditures, promoting self-sufficiency among low-income families, and increasing housing choices for these families.

Cost Effectiveness:

- By paying subsidies directly to tenants, Lewiston Housing reduces the administrative burden associated with managing landlord contracts and payments.
- DRA eliminates the need for ongoing and extensive landlord engagement and outreach.
- Reducing landlord related administrative tasks leads to cost savings for Lewiston Housing.

Self-Sufficiency:

- The DRA program empowers tenants to make financial decisions for themselves, fostering a sense of responsibility and independence. By managing their own rental payments, tenants are encouraged to develop the skills needed to maintain long-term housing stability and financial independence.

Housing Choice:

- Simplifying the process for landlords encourages broader participation in the program and increases the housing options available to tenants.
- Making the subsidy directly available to tenants allows them to choose from a broader range of housing options, including those in low-poverty areas, thereby promoting economic mobility and diversity in housing choices.

By allowing tenants to manage their rental payments directly, the program encourages responsible financial behavior and empowers tenants to make informed housing decisions. This approach could lead to a significant transformation in how federal housing assistance is distributed, offering a model more responsive to the needs of low-income families.

In addition to the HAP flexibility allowed by the Limited Non-Traditional (LNT) waiver, Lewiston Housing is requesting to waive the following specific regulations under its Moving to Work (MTW) status as part of the LNT waiver:

- 24 CFR 982.401: This regulation establishes the Housing Quality Standards (HQS) that must be met for units subsidized under the HCV program. Lewiston Housing proposes modifying the HQS requirements to allow for a simplified inspection process, including tenant self-inspections at move-in and a modified inspection schedule thereafter.
- 24 CFR 982.507: This regulation requires that the PHA ensure that the landlord's rent is reasonable in comparison to rents charged for comparable unassisted units in the area. Lewiston Housing proposes waiving this requirement, as the DRA model shifts responsibility for rent negotiation and payment to tenants, thereby reducing administrative burden and promoting housing choice.

Program Design

The DRA pilot program will last five years and be limited to a set of participants. Households must meet the standard HCV program requirements to be eligible to participate. The MTW activity does not apply to a subset population and will include all eligible households.

Waiting List

A separate waiting list will be maintained for the DRA program. Current HCV participants may apply for the DRA program, understanding that they cannot receive both HCV and DRA subsidies simultaneously and would be required to participate in only one program.

A preference will be added to the HCV Administrative Plan to allow participants to transition to the HCV program at the end of the pilot program. DRA participants should maintain good standing on the HCV waiting list.

DRA calculations

Lewiston Housing proposes calculating the DRA payment by first determining the Total Tenant Payment (TTP) based on current HCV program rules, which is set at 30% of the tenant's adjusted income. The DRA payment will then be calculated as the difference between the payment standard for the eligible bedroom size and the TTP, with a cap set at the lower of the unit's gross rent or the calculated DRA subsidy. This ensures that the DRA payment never exceeds the total gross rent for the unit.

Given the challenging rental market in Lewiston, where the vacancy rate is below 1% and Fair Market Rents (FMRs) significantly lag behind actual market rates, our payment standard is currently set at 120% of the FMR. While this elevated payment standard aims to better align with local market conditions, it may still need to cover prevailing market rents. However, the DRA provided to tenants will offer crucial financial support, helping them afford modest housing options in the area.

With the DRA program, one goal is to reduce barriers to housing. In the traditional HCV program, participants typically pay only their portion of the rent to the landlord, which is calculated to be

affordable based on their income. However, requiring DRA participants to pay the total rent at move-in could present a significant barrier to securing housing.

To address this, DRA participants will receive a payment at the time of voucher issuance that covers the security deposit, up to the payment standard, and the first month's DRA payment. Security deposits will be handled under our existing landlord incentive program, following its established rules. After move-in, the second DRA payment will be prorated based on the actual security deposit and rental expenses incurred.

DRA participants must sign an acknowledgment that they are receiving a prepayment. If the participant does not lease-up, the funds must be returned to Lewiston Housing. If the funds are not returned, they will be reported to HUD through the Enterprise Income Verification (EIV) system as amounts owed in arrears.

DRA participants are permitted to lease in place, meaning that if they are already residing in a unit at the time of the DRA voucher award, they may use DRA for that unit. In such cases, participants will not be eligible for security deposit assistance, and no advance payments will be made. Instead, DRA payments will be issued monthly in real time. The first month's payment will be prorated based on the DRA start date, which will be established upon receipt and approval of the unit's initial self-inspection (see Inspection section below).

Inspections

A modified inspection process will be implemented to ensure that the units within the DRA pilot are safe, decent, sanitary, and in good repair. Initially, participants must complete a self-inspection during move-in using a simplified checklist based on NSPIRE standards. This checklist, completed and certified by the participant, must be returned before issuing the first DRA payment. Within 120 days of move-in, Lewiston Housing's Housing Inspector will conduct a formal inspection, with annual inspections scheduled afterward. If the inspection fails, the participant will receive coaching on how to advocate for necessary repairs. For any unaddressed life safety issues, referrals to local legal aid will be made if needed, and participants must pursue all legal remedies available to them for DRA payments to continue. Any known code issues will be reported to the city code office for enforcement. Should the landlord still fail to make the required repairs, the participant must move at the end of the lease term to continue receiving DRA.

Landlords will have access to the existing landlord incentive repair program to cover repair costs if needed at the initial Lewiston Housing move-in inspection.

Timeline for Implementation

If our DRA Pilot Program is approved by December 31, 2024, we anticipate the following timeline for implementation. If our plan is approved later than this date, the timeline will begin the following quarter after approval.

Q1 2025:

- Finalize research design
- Update the Administrative Plan to include the DRA program

- Finalize internal procedures outlined in this proposal and create necessary documents, forms, and educational materials.

Q2 2025:

- Issue the first five DRA vouchers. We will issue five vouchers a month until all 60 DRA vouchers are issued.

HUD Requirements and Compliance

The DRA pilot program will fully comply with HUD regulations and requirements as outlined in HUD Notice PIH 2011-45, which governs the implementation of local, non-traditional activities under the MTW program. Statutory requirements are as follows.

Income Eligibility

The DRA pilot program will serve households meeting the income eligibility criteria defined by HUD, specifically those at or below 80% of the area median income (AMI). Lewiston Housing will conduct rigorous income verifications during the enrollment process and annually to ensure ongoing compliance with these eligibility standards.

Fair Housing and Equal Opportunity

The DRA pilot program will strictly enforce all federal civil rights laws, including compliance with the Fair Housing Act, Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, and the Americans with Disabilities Act. Lewiston Housing is committed to providing equal access to the program for all eligible families and will actively work to affirmatively further fair housing through targeted outreach and recruitment efforts.

Inspections

As described in the program design section, the DRA pilot will implement a modified inspection process. In accordance with HUD standards, units must be maintained in safe, decent, sanitary condition and good repair.

Expenditure of Federal Funds

Lewiston Housing will manage all federal funds allocated to the DRA pilot in strict compliance with the General Depository Agreement (HUD-51999) and other applicable Treasury requirements. Detailed financial records will be maintained to demonstrate that funds are used appropriately and exclusively for the purposes outlined in the DRA program design. Regular audits will be conducted to ensure transparency and compliance with federal financial management standards.

Hardship Policies

Lewiston Housing has established a hardship policy for participants in the DRA pilot. Please see Attachment: Hardship Policy.

Tenant Protections

The DRA pilot will include robust tenant protections to safeguard participants against housing instability and unfair practices. It is important to acknowledge that Lewiston Housing loses some leverage in holding landlords accountable for maintaining property standards and tenant protections without a HAP contract. However, Maine has strong tenant-friendly laws that provide significant protections beyond those typically available in other states. All DRA participants will be provided contact information for Pine Tree Legal, a local legal aid organization, and a copy of Pine Tree Legal's *The Rights of Tenants in Maine* booklet to support participants further. These resources will be communicated to participants at enrollment, ensuring they are fully informed of their rights and available legal support.

Promoting self-sufficiency is a key goal of the DRA pilot. To that end, Lewiston Housing will offer coaching opportunities to help tenants advocate for themselves on issues that do not require legal assistance. By prioritizing self-advocacy, these coaching sessions will empower participants to navigate housing-related challenges more effectively and independently. Additionally, participants will be encouraged to connect with Pine Tree Legal and other resources when necessary, further reinforcing their ability to manage their housing situations confidently.

Reporting and Accountability

Lewiston Housing will adhere to all reporting requirements outlined in HUD Notice PIH 2011-45. In addition, Lewiston Housing will collaborate with a research partner to conduct a study on the effectiveness of the DRA pilot program. This partnership will provide an additional layer of oversight and evaluation, ensuring that the program's impact is thoroughly assessed and understood.

Increased expenditures; 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 (i.e., applicants) only
Does the MTW activity apply to all family types or only to selected family types? The MTW activity applies to all family types
Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about what has been accomplished or changed during the implementation. 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? 1) This activity is specific to emergency shelter beds created with this Local, Non-Traditional waiver. 2) DRA: applies to participants in DRA pilot.

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 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

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

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	New Construction	Gap Financing, Tax Credit Partnership	69.00	69.00	27.00	0.00	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>No</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? No</p>
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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	\$1,657,064	\$1,657,064	\$0	2029-09-30
2022	\$1,638,741	\$1,638,741	\$0	2030-09-30
2023	\$1,707,559	\$1,707,559	\$0	2031-09-30
2024	\$713,031	\$108,341	\$604,691	2032-09-30

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.