

# 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 is submitting this amended waiver to include shared housing in its already approved 9.e. Alternative PBV Unit Types (Shared Housing and Manufactured Housing) (HCV) waiver. The previous annual plan only focused on Manufactured Housing and did not include Shared Housing. Since plan approval, Lewiston Housing is planning to acquire shared housing properties.

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 for residents, and increasing housing choice through various MTW waivers and initiatives. With MTW funding and regulatory flexibility, Lewiston Housing 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, Lewiston Housing 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. Recent Real Estate Market Assessments from 2022 and 2023 indicate a continued rise in local rents, showing a 16% to 18% increase for 1-, 2-, and 3-bedroom units over this period, with many units now at 130% to 135% of the Fair Market Rent (FMR). The rental vacancy rate in Lewiston stands at approximately 2%, significantly below the 5% typically associated with a balanced market turnover. This persistently low vacancy rate further constrains renters' choices as market rents continue to outpace the ability of low-income residents and newly arriving families to secure affordable units. Most affordable and mixed-income properties in the region also report occupancy rates near or at 100%.

Public consulting and gap analysis conducted by the Auburn Lewiston HOME Consortium (completed in 2022 for the HOME-ARP Plan amendment) confirm these market demands. They highlight rising rents, increasing household expenses, and a limited pipeline of new affordable housing, which could lead to a growing number of homeless families in Lewiston without system-level interventions. Lewiston is an affordable alternative for Maine families priced out of Portland and the coastal regions. These trends are likely to persist.

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)
- 5.c. Third-Party Requirement (HCV)
- 9.d. Alternative PBV Selection Process

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

- 1.o. Initial Rent Burden (HCV)
- 1.u. Standard Deductions (HCV)
- 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)
- 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
- 9.e. Alternative PBV Unit Types (Shared Housing and Manufactured Housing) (HCV)
- 17.a. Rental Subsidy Programs
- 17.c. Housing Development Programs

The following waivers are discontinued in this fiscal year or previous:

- 3.c. Self-Certification of Assets (PH)
- 3.d. Self-Certification of Assets (HCV)
- 5.a. Pre-Qualifying Unit Inspections (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 leasing to HCV participants. Given the extremely tight rental market and historically low vacancy rates in Lewiston, adopting 2.a, 2.b, 9.a, 9.b, 9.c, 17.a, and 17.c will help create new housing opportunities that do not currently exist for low-income families in Lewiston.

Additionally, Lewiston Housing proposes to adopt Cohort 4.1: Waiver of Mandatory Initial Inspection as outlined in HUD Notice PIH 2021-03. Under this waiver, the agency may eliminate the requirement for an initial HQS inspection if one of the following criteria is met: (1) the unit is less than five years old, as evidenced by a valid certificate of occupancy; (2) the unit has passed an HQS or equivalent inspection within the past three years; or (3) the unit is located in a census tract with a poverty rate below ten percent. While this waiver reduces administrative burdens and expedites lease-ups, it preserves tenant protections: HQS standards remain in place, units must still undergo regular inspections per Lewiston Housing's schedule, and tenants may request an interim inspection at any time if concerns arise.

**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).**

<b>1. Tenant Rent Policies</b>	
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)	Plan to Implement in the Submission Year
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)	Plan to Implement in the Submission Year
v. Alternative Income Inclusions/Exclusions (PH)	Not Currently Implemented
w. Alternative Income Inclusions/Exclusions (HCV)	Not Currently Implemented
<b>2. Payment Standards and Rent Reasonableness</b>	
a. Payment Standards- Small Area Fair Market Rents (HCV)	Currently Implementing
b. Payment Standards- Fair Market Rents (HCV)	Currently Implementing
c. Rent Reasonableness – Process (HCV)	Plan to Implement in the Submission Year
d. Rent Reasonableness – Third-Party Requirement (HCV)	Plan to Implement in the Submission Year
<b>3. Reexaminations</b>	
a. Alternative Reexamination Schedule for Households (PH)	Currently Implementing
b. Alternative Reexamination Schedule for Households (HCV)	Currently Implementing
c. Self-Certification of Assets (PH)	Was Discontinued in a previous Submission Year
d. Self-Certification of Assets (HCV)	Will be Discontinued in the Submission Year
<b>4. Landlord Leasing Incentives</b>	
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
<b>5. Housing Quality Standards (HQS)</b>	
a. Pre-Qualifying Unit Inspections (HCV)	Will be Discontinued in the Submission Year
b. Reasonable Penalty Payments for Landlords (HCV)	Not Currently Implemented
c. Third-Party Requirement (HCV)	Plan to Implement in the Submission Year
d. Alternative Inspection Schedule (HCV)	Not Currently Implemented
<b>6. Short-Term Assistance</b>	
a. Short-Term Assistance (PH)	Not Currently Implemented
b. Short-Term Assistance (HCV)	Not Currently Implemented
<b>7. Term-Limited Assistance</b>	
a. Term-Limited Assistance (PH)	Not Currently Implemented
b. Term-Limited Assistance (HCV)	Not Currently Implemented
<b>8. Increase Elderly Age (PH &amp; HCV)</b>	

Increase Elderly Age (PH & HCV)	Not Currently Implemented
<b>9. Project-Based Voucher Program Flexibilities</b>	
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)	Currently Implementing
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
<b>10. Family Self-Sufficiency Program with MTW Flexibility</b>	
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
<b>11. MTW Self-Sufficiency Program</b>	
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
<b>12. Work Requirement</b>	
a. Work Requirement (PH)	Not Currently Implemented
b. Work Requirement (HCV)	Not Currently Implemented
<b>13. Use of Public Housing as an Incentive for Economic Progress (PH)</b>	
Use of Public Housing as an Incentive for Economic Progress (PH)	Not Currently Implemented
<b>14. Moving on Policy</b>	
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
<b>15. Acquisition without Prior HUD Approval (PH)</b>	
Acquisition without Prior HUD Approval (PH)	Not Currently Implemented
<b>16. Deconcentration of Poverty in Public Housing Policy (PH)</b>	
Deconcentration of Poverty in Public Housing Policy (PH)	Not Currently Implemented
<b>17. Local, Non-Traditional Activities</b>	
a. Rental Subsidy Programs	Currently Implementing
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**

<b>1.o. - Initial Rent Burden (HCV)</b>
<p><b>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</b></p> <p>Lewiston Housing will increase housing choice for Housing Choice Voucher (HCV), Mainstream, and Direct Rental Assistance (DRA) participants by raising the initial rent burden threshold from 40% to 60% of a family's adjusted monthly income. This waiver will allow participating families to access a broader range of housing options, including units in areas of higher opportunity, by enabling them to pay a greater share of their income toward rent if they choose. While this will increase the financial burden for families opting into higher-cost units, it provides greater autonomy and flexibility in securing housing that best meets their needs. The impact on Housing Assistance Payments will remain neutral, as this waiver only adjusts the tenant portion of the rent share at initial occupancy. Families will be fully informed of this option at initial briefings and lease-ups, where they will receive guidance on affordability thresholds, financial considerations, and the potential long-term impacts of a higher rent burden. Lewiston Housing will ensure that participants understand the risks associated with paying a larger share of their income toward rent and encourage families to make financially sustainable housing decisions.</p>
<p><b>Which of the MTW statutory objectives does this MTW activity serve?</b></p> <p>Housing choice</p>
<p><b>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</b></p> <p>Neutral (no cost implications)</p>
<p><b>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</b></p> <p>The MTW activity applies only to a subset or subsets of assisted households</p>
<p><b>Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?</b></p> <p>New admissions and currently assisted households</p>
<p><b>Does the MTW activity apply to all family types or only to selected family types?</b></p> <p>The MTW activity applies to all family types</p>
<p><b>Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?</b></p> <p>The MTW activity applies to all tenant-based units</p>
<p><b>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.</b></p> <p>N/A - new activity.</p>
<p><b>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</b></p> <p>No</p>
<p><b>Does the MTW activity require an impact analysis?</b></p> <p>Yes</p>

This document is attached.
<b>Does the impact analysis apply to more than this MTW activity?</b> No
<b>If the MTW agency plans to implement a new maximum income-based rent percentage (higher than 40% of adjusted monthly income), what is that maximum?</b> 60.00%

<b>1.u. - Standard Deductions (HCV)</b>
<b>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</b> Lewiston Housing proposes replacing existing medical and childcare expense deductions in the Housing Choice Voucher (HCV) program with a set of standard deductions. This change aims to simplify rent calculations, reduce administrative burdens, and enhance cost-effectiveness. By adopting standard deductions, staff and participants will benefit from more streamlined processes. Proposed Standard Deductions: 1. Elderly/Disabled Households: A single standard medical deduction of \$2,220 per household. To qualify, the household must meet HUD's eligibility criteria for medical deductions. 2. Childcare Deduction: \$1,500 per eligible child for families requiring childcare. To qualify, the household must meet HUD's eligibility criteria for childcare deductions. The goal is to simplify the rent calculation process through standard deductions, thereby reducing administrative complexity, enhancing cost-effectiveness, and improving participant understanding.
<b>Which of the MTW statutory objectives does this MTW activity serve?</b> Cost effectiveness
<b>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</b> Neutral (no cost implications)
<b>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</b> The MTW activity applies to all assisted households
<b>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.</b> N/A - This is a new implementation
<b>Does this MTW activity require a hardship policy?</b> Yes This document is attached.
<b>Does the hardship policy apply to more than this MTW activity?</b> Yes
<b>Please list all of the applicable MTW activities. (Only upload hardship policy once when said policy applies to multiple MTW activities.)</b> 2.a. - Payment Standards- Small Area Fair Market Rents (HCV); 2.b. - Payment Standards- Fair Market Rents (HCV); 3.a.

- Alternative Reexamination Schedule for Households (PH); 3.b. - Alternative Reexamination Schedule for Households (HCV)
<b>Has the MTW agency modified the hardship policy since the last submission of the MTW Supplement?</b> No
<b>How many hardship requests have been received associated with this activity in the past year?</b> No hardship were requested in the most recent fiscal year.
<b>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</b> No
<b>Does the MTW activity require an impact analysis?</b> Yes  This document is attached.
<b>Does the impact analysis apply to more than this MTW activity?</b> No
<b>How much will the single standard deduction be in the Fiscal Year?</b> \$2,200

<b>2.a. - Payment Standards- Small Area Fair Market Rents (HCV)</b>
<b>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</b> We propose modifying last year's approved waiver by expanding our combined Small Area Fair Market Rents to include ZIP codes 04240, 04236, 04280, 04250, 04252, and 04210. This change applies to all new Project-Based Voucher (PBV) contracts effective on or after July 1, 2024, and those contracts must still meet all other rent-setting requirements. The payment standard will be set at up to 150% of the combined SAFMR, using the highest ZIP code's SAFMR in the group. Because these areas are geographically close and share similar market conditions, grouping them will help support new housing developments and increase housing options. Our goal is to expand housing options.
<b>Which of the MTW statutory objectives does this MTW activity serve?</b> Housing choice
<b>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</b> Neutral (no cost implications)
<b>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</b> The MTW activity applies only to a subset or subsets of assisted households
<b>Does the MTW activity apply only to new admissions, only to currently assisted households, or to both new admissions and currently assisted households?</b> New admissions and currently assisted households



<p><b>Does the MTW activity apply to all family types or only to selected family types?</b></p> <p>The MTW activity applies to all family types</p>
<p><b>Does the MTW activity apply to all HCV tenant-based units and properties with project-based vouchers?</b></p> <p>The MTW activity applies to all properties with project-based vouchers</p>
<p><b>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.</b></p> <p>While this waiver was approved last year, we have not yet implemented it on any new PBV contracts to date. We anticipate the first PBV contract falling under this waiver at the end of the calendar year.</p>
<p><b>Does this MTW activity require a hardship policy?</b></p> <p>Provided Already</p>
<p><b>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</b></p> <p>No</p>
<p><b>Does the MTW activity require an impact analysis?</b></p> <p>Yes</p> <p>This document is attached.</p>
<p><b>Does the impact analysis apply to more than this MTW activity?</b></p> <p>No</p>
<p><b>Please explain the payment standards by ZIP code or "grouped" ZIP codes:</b></p> <p>The highest 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, determined annually.</p>

<p><b>2.b. - Payment Standards- Fair Market Rents (HCV)</b></p>
<p><b>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</b></p> <p>Through a previous MTW waiver, we received authorization to increase our Payment Standard to 120% of FMR. However, due to anticipated budget constraints this past year, we temporarily reduced it to 110%. With this MTW waiver request, we seek to retain the flexibility to raise the Payment Standard above 110% as funding allows.</p> <p>This waiver is critical for expanding housing options for voucher holders in a rental market where costs continue to rise, and vacancy rates remain historically low. Our voucher utilization rate remains below target, and a lower Payment Standard further limits access to available units. Our goal is to increase our utilization rate.</p> <p>We do not anticipate additional cost implications, as we are currently operating at 110% of FMR. Over the next year, we will assess budget capacity and adjust the Payment Standard above 110% as feasible to improve voucher utilization.</p>
<p><b>Which of the MTW statutory objectives does this MTW activity serve?</b></p> <p>Housing choice</p>
<p><b>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</b></p> <p>Neutral (no cost implications)</p>
<p><b>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of</b></p>

<p><b>assisted households?</b></p> <p>The MTW activity applies to all assisted households</p>
<p><b>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.</b></p> <p>We did not meet our goal of increasing our utilization rate, and since implementing this waiver last year, we have decreased our payment standard due to anticipated budget constraints.</p>
<p><b>Does this MTW activity require a hardship policy?</b></p> <p>Provided Already</p>
<p><b>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</b></p> <p>No</p>
<p><b>Does the MTW activity require an impact analysis?</b></p> <p>Yes</p> <p>This document is attached.</p>
<p><b>Does the impact analysis apply to more than this MTW activity?</b></p> <p>No</p>
<p><b>Please explain the payment standards by FMR:</b></p> <p>Flexibility to increase up to 120% of FMR.</p>

<p><b>2.c. - Rent Reasonableness – Process (HCV)</b></p>
<p><b>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</b></p> <p>Lewiston Housing proposes to implement a simplified local rent reasonableness approach under Waiver 2.c. by creating a single table for our entire jurisdiction that categorizes units based on size, type, and age (pre-1980 or post-1980). This streamlined method will replace the more complex system currently in use and reduce the administrative burden of collecting and verifying detailed comparables, thereby enhancing cost-effectiveness. By regularly updating the table annually with local market data, Lewiston Housing will ensure that rents remain fair and reflective of prevailing conditions. Owners or participants who believe the table's range does not accurately represent a specific unit's value may request a review or submit additional documentation. Our goal is to decrease staff time processing rent reasonableness.</p>
<p><b>Which of the MTW statutory objectives does this MTW activity serve?</b></p> <p>Cost effectiveness</p>
<p><b>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</b></p> <p>Decreased expenditures</p>
<p><b>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</b></p> <p>The MTW activity applies to all assisted households</p>
<p><b>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.</b></p>

n/a - new waiver

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

No

**Describe the method used to determine rent reasonableness and the motivations for using a method different from the standard method.**

Lewiston Housing will establish and maintain a single rent reasonableness table that groups units by key factors such as size, type, and age (pre-1980 or post-1980), drawing on regularly updated local market data from rental listings to determine a fair range of rents for each category. This table will be updated annually. This approach differs from the standard requirement, which involves collecting comparables and verifying rent reasonableness on a unit-by-unit basis because it simplifies the process, reduces administrative workload, and provides a more transparent method for landlords and tenants.

## **2.d. - Rent Reasonableness – Third-Party Requirement (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 proposes to conduct its own rent reasonableness determinations for PHA-owned Project-Based Voucher (PBV) units, utilizing the same table-based approach described under Waiver 2.c. Rather than engaging a third party for each determination, we will employ a robust quality assurance method, such as random sampling and periodic audits, to ensure impartial outcomes. By performing these determinations in-house, Lewiston Housing will streamline operations, reduce costs, and maintain a uniform standard for rent reasonableness across both agency-owned and non-agency-owned units.

**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 revenue

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

The MTW activity applies to all assisted households

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

n/a - new waiver.

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

No

**Please explain or upload a description of the quality assurance method.**

Lewiston Housing will rely on its Compliance Manager, who operates independently from the Rental Assistance department, to conduct periodic audits of rent determinations and ensure impartiality. On a quarterly basis, the Compliance Manager will select a random sample of PHA-owned PBV units for review. Each review will verify that the assigned rent aligns with the table-based method, confirm that the units' characteristics match the correct rent category, and compare the results against recent market data to ensure consistency. If discrepancies are found, the Compliance Manager will recommend corrective actions, such as additional training or a deeper assessment of any outliers, and will track resolution progress. By vesting oversight in an independent role and conducting regular audits, this quality assurance approach protects the integrity of rent reasonableness determinations and maintains accountability in the absence of a third-party

requirement.

No document is attached.

**Please explain or upload a description of the rent reasonableness determination method.**

Lewiston Housing will establish and maintain a single rent reasonableness table that groups units by key factors such as size, type, and age (pre-1980 or post-1980), drawing on regularly updated local market data from rental to determine a fair range of rents for each category.

No document is attached.

**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**

Due to the success of our biennial recertification schedule, Lewiston Housing is modifying this waiver to transition all Housing Choice Voucher (HCV) and Public Housing (PH) participants from a biennial to a triennial recertification schedule. Because the recertification process is time-consuming and administratively burdensome while tenant rents generally remain stable year to year, moving to a triennial cycle will further improve operational efficiency, allowing staff to focus on other critical program tasks and ensuring income reviews remain accurate and thorough.

Lewiston Housing will continue to limit households to one interim recertification per year if their gross household income decreases by 10% or more. Required interim recertifications, such as those prompted by changes in household composition or other agency requirements, will not count toward this limit.

Households will be divided into three equal groups, with each group assigned to a different recertification cycle. The transition to triennial recertifications will begin with each household's next scheduled recertification, effective January 1, 2025, and beyond.

Our goal is to increase efficiency and streamline operations.

**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 revenue

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

The MTW activity applies to all assisted households

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

We have increased efficiency with processing recertifications, and this has allowed us to save at least 1 FTE.

**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?**

<p>Yes</p> <p>This document is attached.</p>
<p><b>Does the impact analysis apply to more than this MTW activity?</b></p> <p>Yes</p>
<p><b>Please list all of the applicable MTW activities. (Only upload impact analysis once when said impact analysis applies to multiple MTW activities.)</b></p> <p>3.b. - Alternative Reexamination Schedule for Households (HCV)</p>
<p><b>What is the recertification schedule?</b></p> <p>Once every three years</p>
<p><b>How many interim recertifications per year may a household request?</b></p> <p>1</p>
<p><b>Please describe briefly how the MTW agency plans to address changes in family/household circumstances under the alternative reexamination schedule.</b></p> <p>Lewiston Housing will continue to limit households to one interim recertification per year if their gross household income decreases by 10% or more. Required interim recertifications, such as those prompted by changes in household composition or other agency requirements, will not count toward this limit. Should a household have an interim request that falls outside these parameters, they may apply for a hardship exemption per the hardship policy.</p>

<p><b>3.b. - Alternative Reexamination Schedule for Households (HCV)</b></p>
<p><b>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</b></p> <p>Due to the success of our biennial recertification schedule, Lewiston Housing is modifying this waiver to transition all Housing Choice Voucher (HCV) and Public Housing (PH) participants from a biennial to a triennial recertification schedule. Because the recertification process is time-consuming and administratively burdensome while tenant rents generally remain stable year to year, moving to a triennial cycle will further improve operational efficiency, allowing staff to focus on other critical program tasks and ensuring income reviews remain accurate and thorough.</p> <p>Lewiston Housing will continue to limit households to one interim recertification per year if their gross household income decreases by 10% or more. Required interim recertifications, such as those prompted by changes in household composition or other agency requirements, will not count toward this limit.</p> <p>Households will be divided into three equal groups, with each group assigned to a different recertification cycle. The transition to triennial recertifications will begin with each household's next scheduled recertification, effective January 1, 2025, and beyond.</p> <p>Our goal is to increase efficiency and streamline operations.</p>
<p><b>Which of the MTW statutory objectives does this MTW activity serve?</b></p> <p>Cost effectiveness</p>
<p><b>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</b></p> <p>Decreased revenue</p>
<p><b>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</b></p> <p>The MTW activity applies to all assisted households</p>
<p><b>Based on the Fiscal Year goals listed in the activity's previous Fiscal Year's narrative, provide a description about</b></p>

<p><b>what has been accomplished or changed during the implementation.</b></p> <p>We have increased efficiency with processing recertifications, and this has allowed us to save at least 1 FTE.</p>
<p><b>Does this MTW activity require a hardship policy?</b></p> <p>Provided Already</p>
<p><b>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</b></p> <p>No</p>
<p><b>Does the MTW activity require an impact analysis?</b></p> <p>Provided Already</p>
<p><b>What is the recertification schedule?</b></p> <p>Once every three years</p>
<p><b>How many interim recertifications per year may a household request?</b></p> <p>1</p>
<p><b>Please describe briefly how the MTW agency plans to address changes in family/household circumstances under the alternative reexamination schedule.</b></p> <p>Lewiston Housing will continue to limit households to one interim recertification per year if their gross household income decreases by 10% or more. Required interim recertifications, such as those prompted by changes in household composition or other agency requirements, will not count toward this limit. Should a household have an interim request that falls outside these parameters, they may apply for a hardship exemption per the hardship policy.</p>

<p><b>3.c. - Self-Certification of Assets (PH)</b></p>
<p><b>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</b></p> <p>We discontinued this MTW activity in the previous fiscal year.</p>
<p><b>Which of the MTW statutory objectives does this MTW activity serve?</b></p> <p>Cost effectiveness</p>
<p><b>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</b></p> <p>Neutral (no cost implications)</p>
<p><b>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</b></p> <p>The MTW activity applies to all assisted households</p>
<p><b>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.</b></p> <p>N/A</p>
<p><b>Please provide an explanation as to why the activity was discontinued or will be discontinued.</b></p> <p>This activity was discontinued due to a change in HOTMA rules that allow for self-certification of assets.</p>

<p><b>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</b></p> <p>No</p>
<p><b>Please state the dollar threshold for the self-certification of assets.</b></p> <p>\$0.</p>

<p><b>3.d. - Self-Certification of Assets (HCV)</b></p>
<p><b>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</b></p> <p>This activity is discontinued due to a change in HOTMA rules that allow for self-certification of assets.</p>
<p><b>Which of the MTW statutory objectives does this MTW activity serve?</b></p> <p>Cost effectiveness</p>
<p><b>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</b></p> <p>Neutral (no cost implications)</p>
<p><b>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</b></p> <p>The MTW activity applies to all assisted households</p>
<p><b>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.</b></p> <p>N/A</p>
<p><b>Please provide an explanation as to why the activity was discontinued or will be discontinued.</b></p> <p>This activity is discontinued due to a change in HOTMA rules that allow for self-certification of assets.</p>
<p><b>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</b></p> <p>No</p>
<p><b>Please state the dollar threshold for the self-certification of assets.</b></p> <p>\$0.</p>

<p><b>4.a. - Vacancy Loss (HCV-Tenant-based Assistance)</b></p>
<p><b>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</b></p> <p>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.</p> <p>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.</p>

This activity will apply to Emergency Housing Vouchers and Mainstream Vouchers that Lewiston Housing administers, as allowed by the specific specialty voucher.

Vacancy Loss will not be available for Direct Rental Assistance.

**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 two requests for vacancy loss from landlords totaling \$1020 since July 1, 2024, which is a decrease from last year. 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's rent

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

2

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

\$1,020

**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**

The current waiver is as follows. We plan to replace it with Cohort 4.1: Waiver of Mandatory Initial Inspection. 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

**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.**

The previous year, we saw an increase in the use of this waiver from zero for the first year to four for this plan year since 7/1/2024.

**Please provide an explanation as to why the activity was discontinued or will be discontinued.**

Lewiston Housing plans to discontinue this waiver in this plan year due to the adopting Cohort 4.1: Waiver of Mandatory Initial Inspection, which expands the parameters of this waiver.

**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.

#### **5.c. - Third-Party Requirement (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 proposes to adopt Waiver 5.c. (Third-Party Requirement) to perform HQS inspections on agency-owned, managed, or controlled Project-Based Voucher (PBV) units. By conducting these inspections in-house, we aim to streamline processes while maintaining strict adherence to all HQS standards under 24 C.F.R. 982.401. To ensure an objective analysis, Lewiston Housing will implement a comprehensive quality assurance method, including periodic audits or random spot-checks by our construction manager, independent of the rental assistance team. Participants will retain the right to request interim inspections if they identify any issues requiring prompt attention, and Lewiston Housing will address these requests in accordance with standard HQS procedures. This approach promotes efficiency and supports timely service delivery by not relying on a third party. We anticipate cost savings due to not paying a third-party inspector fee, as well as creating fewer delays for households moving into apartments.

**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 revenue
<b>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</b>  The MTW activity applies to all assisted households
<b>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.</b>  n/a - new waiver
<b>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</b>  No
<b>Please explain or upload the description of the quality assurance method:</b>  Following will explain the quality assurance method Following will explain the quality assurance method Our construction manager, who operates independently from both the property management and rental assistance departments, will perform quality assurance inspections on ten percent of these units each year. As the owner representative for new developments and larger construction projects, he is well-positioned to provide an impartial assessment of inspection outcomes and verify that units meet HQS standards.  No document is attached.

<b>9.a. - Increase PBV Program Cap (HCV)</b>
<b>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</b> 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.
<b>Which of the MTW statutory objectives does this MTW activity serve?</b>  Housing choice
<b>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</b>  Neutral (no cost implications)
<b>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</b>  The MTW activity applies to all assisted households
<b>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.</b>  While this waiver is in effect, we have not yet needed to utilize it.
<b>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</b>

No
<b>What percentage of total authorized HCV units will be authorized for project-basing?</b> 50.00%

<b>9.b. - Increase PBV Project Cap (HCV)</b>
<b>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</b> 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.
<b>Which of the MTW statutory objectives does this MTW activity serve?</b> Housing choice
<b>What are the cost implications of this MTW activity? Pick the best description of the cost implications based on what you know today.</b> Neutral (no cost implications)
<b>Does the MTW activity under this waiver apply to all assisted households or only to a subset or subsets of assisted households?</b> The MTW activity applies to all assisted households
<b>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.</b> While we have this waiver in place, we have not needed to utilize it this fiscal year.
<b>Does the MTW agency need a Safe Harbor Waiver to implement this MTW activity as described?</b> No

<b>9.c. - Elimination of PBV Selection Process for PHA-owned Projects Without Improvement, Development, or Replacement (HCV)</b>
<b>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</b> 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, as well as increase housing choice.
<b>Which of the MTW statutory objectives does this MTW activity serve?</b> 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

**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.

**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

#### **9.e. - Alternative PBV Unit Types (Shared Housing and Manufactured Housing) (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 proposes adopting Waiver 9.e. (Alternative PBV Unit Types) to attach and pay Project-Based Voucher (PBV) assistance on qualifying manufactured homes and shared housing in Lewiston and surrounding areas. This waiver was previously approved for manufactured housing only.

Manufactured housing accounts for approximately 8% of Maine's housing stock, the highest rate in New England. By enabling PBV assistance on these properties, Lewiston Housing will increase rental choices for voucher holders, help stabilize families in cost-effective, safe homes, and better address the overall shortage of affordable units.

Since receiving approval for manufactured housing, Lewiston Housing has also begun exploring the purchase of boarding homes, which fall under the definition of shared housing. Boarding homes are prevalent in Lewiston and often house tenants who are unable to secure other affordable housing options. By acquiring these properties and applying PBV assistance, Lewiston Housing can create an affordable stepping stone for households to achieve their long-term housing goals.

In line with all waiver requirements, each PBV-assisted manufactured home will fully comply with Housing Quality Standards (HQS), abide by deconcentration and desegregation requirements under 24 C.F.R. part 903, and undergo a subsidy layering review. This targeted focus on manufactured housing helps ensure long-term affordability and quality while meeting the area's immediate housing needs.

Our goal is to increase housing options for Maine families.

**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.**

n/a - new waiver

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

No

**How many shared housing units does the MTW agency anticipate assisting in the Fiscal Year?**

36

**How many shared housing units did the MTW agency assist in the most recently completed PHA Fiscal Year?**

0

**How many manufactured housing units does the MTW agency anticipate assisting in the Fiscal Year?**

50

**How many manufactured housing units did the MTW agency assist in the most recently completed PHA Fiscal Year?**

0

**17.a. - Rental Subsidy Programs**

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

Lewiston Housing's current waiver focuses on a rental subsidy program funded with non-traditional resources to address Lewiston's escalating homelessness crisis. This proposal aims to maintain or potentially expand the operation of a permanent indoor shelter, providing safe, reliable housing for up to 100 unhoused individuals while creating a centralized service center—an innovative first for Androscoggin County. Program funds will support existing shelter beds and establish new ones as needed, with a modified subsidy rate of \$3.42 per bed per night for this fiscal year. Given the severe financial hardships faced by this population, the tenant share will be set at \$0, ensuring unrestricted access for those most in need. All shelter guests utilizing the subsidy will have low incomes or below.

In compliance with PIH Notice 2011-45, Lewiston Housing will distribute funds to local homeless service providers through a competitive process, adhering to all other applicable requirements of the Notice. We seek formal approval of this MTW activity, which forms an essential component of Lewiston's strategic response to homelessness by preserving and expanding vital shelter resources for the city's most vulnerable citizens. Establishing a central service center will help comprehensively address the needs of Lewiston's unhoused population, while supporting our overarching goal of creating diverse housing options and reducing the overall number of people experiencing homelessness in Lewiston.

The Lewiston Housing Authority (LHA) has been approved for a Safe Harbor Waiver to raise the 10% HAP cap on its LNT activities to 25%.

**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.**

Planning is underway for a permanent homeless shelter in Lewiston. We plan to issue an RFP in the coming months to begin implementing this waiver.

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

Yes

**What is the status of the Safe Harbor Waiver request?**

The waiver was previously approved.

**Please describe the extent to which the Safe Harbor Waiver is supporting the MTW agency's goal in implementing this MTW activity.**

The Lewiston Housing Authority (LHA) has been approved for a Safe Harbor Waiver to raise the 10% HAP cap on its LNT activities to 25%.

**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
Kaydenz Kitchen	Emergency Shelter	60.00

#### 17.c. - Housing Development Programs

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

Lewiston Housing proposes to implement a local, non-traditional activity under MTW Funding to finance the acquisition, renovation, and construction of affordable housing units for low-income families (at or below 80% of Area Median Income) that are not public housing units. This waiver authorizes the agency to utilize MTW Funding to support housing development projects that expand affordable housing options. All projects funded under this waiver will comply with applicable statutory requirements, including PIH Notice 2011-45 and Section 30 of the 1937 Housing Act. Any MTW Funding awarded to a third-party provider will be competitively bid.

Lewiston Housing is seeking a safe harbor waiver to exceed the standard limit of 10% of our HAP budget for local, non-traditional activities. This request is driven by the simultaneous implementation of additional Local Non-Traditional (LNT) activities and a Direct Rental Assistance (DRA) program that are critical to addressing the growing affordable housing needs in our community. By obtaining this waiver, we will be able to leverage MTW Funding more flexibly to expand housing choice among low-income families, all while remaining fully compliant with MTW statutory and regulatory requirements.

The Lewiston Housing Authority (LHA) has been approved for a Safe Harbor Waiver to raise the 10% HAP cap on its LNT activities to 25%.

Which of the MTW sta

**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.**

We were able to move two new affordable housing projects forward with this waiver in the previous Fiscal Year. We used our MTW flexibility for pre-development activities for both Martel School Apartments and DeWitt Phase 2 (104 Park St/61 Ash Street/Soliel). Both projects are at various stages of development, and we expect units to start to come online in about a year.

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

Yes

**What is the status of the Safe Harbor Waiver request?**

The waiver was previously approved.

**Please describe the extent to which the Safe Harbor Waiver is supporting the MTW agency's goal in implementing this MTW activity.**

The Lewiston Housing Authority (LHA) has been approved for a Safe Harbor Waiver to raise the 10% HAP cap on its LNT activities to 25%.

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

Name of Development and Address	MTW Role: Acquisition, Rehabilitation, New Construction?	Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other	Number of Affordable Units	Total Number of Units	Number of Units by Affordability - 80% of AMI	Number of Units by Affordability - 50% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other
Martel School Apartments	New Construction	Tax Credit, Gap	4.00	132.00	0.00	0.00	0.00	4.00
DeWitt Phase 2 (104 Park, 61 Ash, Soliel)	New Construction	Tax Credit, Gap	6.00	200.00	0.00	0.00	0.00	6.00
163 Bates St	Acquisition	Gap	12.00	36.00	0.00	0.00	0.00	12.00
Maison Marcotte	Acquisition, Rehab	Tax Credit, Gap	12.00	168.00	0.00	0.00	0.00	12.00
Ramada Conversion	Acquisition, Rehabilitation, New Construction	Tax Credit, Gap	12.00	168.00	0.00	0.00	0.00	12.00

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

Name of Development and Address	MTW Role: Acquisition, Rehabilitation, New Construction?	Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other	Number of Affordable Units	Total Number of Units	Number of Units by Affordability - 80% of AMI	Number of Units by Affordability - 50% of AMI	Number of Units by Affordability - 30% of AMI	Number of Units by Affordability - Other
Martel School Apartments	New Construction	Tax Credit, Gap	4.00	132.00	0.00	0.00	0.00	4.00
DeWitt Phase 2 (104 Park, 61 Ash, Soliel)	New Construction	Tax Credit, Gap	6.00	200.00	0.00	0.00	0.00	6.00
163 Bates St	Acquisition	Gap	12.00	36.00	0.00	0.00	0.00	12.00
Maison Marcotte	Acquisition, Rehab	Gap, Tax Credit	12.00	168.00	0.00	0.00	0.00	12.00

**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	Tax Credit, Gap	4.00	132.00	0.00	0.00	0.00	4.00
DeWitt Phase 2 (104 Park, 61 Ash, Soliel)	Acquisition, New Construction	Tax Credit, Gap	6.00	200.00	0.00	0.00	0.00	6.00



**Housing Development Programs that the MTW Agency spent funds on in prior Fiscal Year**

<b>Name of Development and Address</b>	<b>MTW Role: Acquisition, Rehabilitation, New Construction?</b>	<b>Type of MTW Agency Financing: Gap Financing, Tax Credit Partnership, Other</b>	<b>Number of Affordable Units</b>	<b>Total Number of Units</b>	<b>Number of Units by Affordability - 80% of AMI</b>	<b>Number of Units by Affordability - 50% of AMI</b>	<b>Number of Units by Affordability - 30% of AMI</b>	<b>Number of Units by Affordability - Other</b>
	New Construction, Acquisition	Gap, Tax Credit	6.00	200.00	0.00	0.00	0.00	6.00
	New Construction	Tax Credit, Gap	132.00	4.00	0.00	0.00	0.00	4.00

<b>D.</b>	<b>Safe Harbor Waivers.</b>
<b>D.1</b>	<p><b>Will the MTW agency submit request for approval of a Safe Harbor Waiver this year?</b></p> <p>No Safe Harbor Waivers are being requested.</p>

<b>E.</b>	<b>Agency-Specific Waiver(s).</b>
<b>E.1</b>	<p><b>Agency-Specific Waiver(s) for HUD Approval:</b></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><b>Will the MTW agency submit a request for approval of an Agency-Specific Waiver this year?</b></p> <p>No</p>

E.2	<b>Agency-Specific Waiver(s) for which HUD Approval has been Received:</b>				
	<b>Does the MTW agency have any approved Agency-Specific Waivers?</b>				
	Yes				
	Title	Has there been a change in how the waiver is being implemented from when it was originally approved?	Please provide a description of what has changed.	Please provide a description of the final outcomes and lessons learned from implementing this Activity at your PHA.	If the MTW Agency was previously required to prepare an impact analysis, was a final impact analysis prepared at the time of discontinuation?
	Cohort Specific Waiver 4.1: Waiver of Mandatory Initial Inspection	No			
	Direct Rental Assistance Pilot	No			

<b>F.</b>	<b>Public Housing Operating Subsidy Grant Reporting.</b>
<b>F.1</b>	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	\$1,667,530	\$1,667,530	\$0	2032-09-30
2025	\$1,349,117	\$1,104,227	\$244,889	2033-09-30

<b>G.</b>	<b>MTW Statutory Requirements.</b>
<b>G.1</b>	<p><b>75% Very Low Income – Local, Non-Traditional.</b></p> <p>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.</p>
<b>Income Level</b>	<b>Number of Local, Non-Traditional Households Admitted in the Fiscal Year*</b>
80%-50% Area Median Income	0
49%-30% Area Median Income	0
Below 30% Area Median Income	0
Total Local, Non-Traditional Households	<b>0</b>

\*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.

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

<b>G.3</b>	<b>Substantially the Same (STS) – Local, Non-Traditional.</b>
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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<b>G.4</b>	<b>Comparable Mix (by Family Size) – Local, Non-Traditional.</b>
<p>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.</p>	

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