

Business Item

Community Development Committee



Committee Meeting Date: June 6, 2022

For the Metropolitan Council: June 22, 2022

Business Item: 2022-152

Approval of Joint Powers Agreement Between the Metropolitan Council and the Minneapolis Public Housing Authority (MPHA) for the administration of the Community Choice Demonstration

District(s), Member(s):	All
Policy/Legal Reference:	Minn. Stat. §§ 473.195, subd. 1 & 471.59
Staff Prepared/Presented:	Terri Smith, Director, Housing and Redevelopment Authority, (651) 602-1187
Division/Department:	Community Development / Metro HRA

Proposed Action

That the Metropolitan Council:

1. Approve the attached Joint Powers Agreement between the Metropolitan Council and the Minneapolis Public Housing Authority (MPHA) for the administration of the Community Choice Demonstration program.
2. Authorize the Community Development Director to execute the Agreement on behalf of the Council.

Background

The U.S. Department of Housing and Urban Development (HUD) awarded the Minneapolis Public Housing Authority (MPHA) and the Metropolitan Council's Housing and Redevelopment Authority (Metro HRA) \$5.2 million under the Housing Choice Voucher Mobility Demonstration. The Demonstration builds on recent research that shows growing up in neighborhoods with lower levels of poverty improves children's academic achievement and long-term chances of success.

The program will support Metro HRA and MPHA in addressing barriers to increasing housing choices by offering mobility-related supports. The program will also include a rigorous, independent evaluation to determine which supports are most effective in helping families achieve success. In addition to the program funding, each agency was awarded 74 new vouchers to support the effort.

The MPHA is the lead applicant and Metro HRA will act as the program administrator. This will include hiring a team of mobility program staff, operating the program, and relying on its existing voucher mobility experience to provide services for voucher families with children, including:

- Landlord Recruitment
- Pre-Move Counseling
- Housing Search Assistance
- Post-Move Counseling

In addition to offering mobility-related services, the agencies will work together to adopt administrative policies that enable housing mobility, increase landlord participation, and reduce

barriers for families to move across jurisdictions. The program will assist voucher holders in moving to an area of their choice which often includes, but is not limited to, areas where families with vouchers have been historically excluded.

HUD awarded a total of \$45.7 million to nine lead public housing authorities. The program will provide more than 10,000 families with children better access to low-poverty neighborhoods with high-performing schools and other strong community resources.

The Demonstration will run for a 6-year period ending October 2028. The first year is a planning year that will include program design, weekly meetings with HUD technical assistance team, hiring mobility team staff, collaboration with other Demonstration agencies, and community and resident engagement.

The purpose of the Joint Powers Agreement is to (1) define the agreed upon roles and responsibilities of the MPHA and the Council as partners in implementing the Demonstration; (2) authorize the Council to: (i) administer its Mobility Demonstration Vouchers and its Turnover Vouchers in the City of Minneapolis; and (ii) provide mobility-related services to Participant Families in the City of Minneapolis, subject to the terms and conditions in this Agreement; and (3) authorize the MPHA to administer its Mobility Demonstration Vouchers and its Turnover Vouchers in the Council's jurisdiction subject to the terms and conditions in this Agreement..

Rationale

The Joint Powers Agreement is a requirement of the Community Choice Program and will allow the MPHA and the Metro HRA to operate in each other's jurisdictions for the purposes of the Demonstration.

Thrive Lens Analysis

The Mobility Demonstration program supports the Thrive outcomes of equity, livability, and prosperity by assisting voucher families in moving to an area of their choice and providing mobility-related supports towards achieving success.

Funding

Funding for the Community Choice Demonstration is provided by the U.S. Department of Housing and Urban Development.



Council Contract No.

MPHA No.

JOINT EXERCISE OF POWERS AGREEMENT

BETWEEN THE METROPOLITAN COUNCIL AND THE MINNEAPOLIS PUBLIC HOUSING AUTHORITY

FOR THE CROSS JURISDICTIONAL ADMINISTRATION OF VOUCHERS PURSUANT TO THE HOUSING CHOICE VOUCHER COMMUNITY CHOICE DEMONSTRATION

THIS AGREEMENT (“Agreement”) is between the Minneapolis Public Housing Authority in and for the City of Minneapolis (the “MPHA”) and the Metropolitan Council (the “Council”), acting through its Metropolitan Housing and Redevelopment Authority unit (“Metro HRA”). The MPHA and the Council are collectively referred to herein as “the Parties” and individually as a “Party.”

WHEREAS, pursuant to a HUD Notice (85 Fed. Reg. 42,890 (July 15, 2020)) the MPHA and the Council jointly applied for voucher assistance and mobility-related services grant funding through the Housing Choice Voucher (HCV) Mobility Demonstration program also known as the Community Choice Demonstration (the “Demonstration”); and

WHEREAS, the MPHA and the Council were awarded 74 Mobility Demonstration Vouchers (37 vouchers each) along with associated funding for those vouchers and the MPHA, as the “lead PHA,” was awarded grant funding for mobility-related services; and

WHEREAS, the Council administers federal Section 8 HCV program assistance for households in Anoka, Carver, and most of suburban Hennepin and Ramsey counties (excluding the cities of Minneapolis, Saint Paul, Bloomington, Plymouth, Richfield, and St. Louis Park) and the MPHA administers a federal Section 8 HCV program within the City of Minneapolis but does not administer Section 8 HCV assistance in suburban areas (the Council’s and the MPHA’s respective “jurisdictions”); and

WHEREAS, the Demonstration requires the cross jurisdictional administration of mobility vouchers by the MPHA and the Council to reduce barriers for families to move across the MPHA’s and the Council’s jurisdictions and encourage families to move to Opportunity Areas; and

WHEREAS, under Minnesota Statutes, section 473.195, subdivision 1, the Council cannot administer Section 8 assistance in Minneapolis or provide mobility-related services to Minneapolis families unless the Council enters into a joint or other cooperative agreement with the MPHA for the administration of Section 8 assistance in Minneapolis; and

WHEREAS, the Council and the MPHA are “governmental units” under Minnesota Statutes, section 471.59, subdivision 1, and are authorized under section 471.59, subdivision 1, to jointly or cooperatively exercise any power common to the contracting parties or any similar powers, including those powers which are the same except for the territorial limits within which those powers may be exercised; and

WHEREAS, the Board of Commissioners of the Minneapolis Public Housing Authority approved this Agreement by action at its [REDACTED], [REDACTED] 2022 meeting (Resolution No. 22-[REDACTED]) and the governing body of the Metropolitan Council approved this Agreement by action at its [REDACTED], [REDACTED] 2022 meeting (Business Item No. 2022-[REDACTED]).

NOW, THEREFORE, the MPHA and the Council agree as follows:

I. PURPOSE

1.01 Purpose. This Agreement: (1) defines the agreed upon roles and responsibilities of the MPHA and the Council as partners in implementing the Demonstration; (2) authorizes the Council to: (i) administer its Mobility Demonstration Vouchers and its Turnover Vouchers in the City of Minneapolis; and (ii) provide mobility-related services to Participant Families in the City of Minneapolis, subject to the terms and conditions in this Agreement; and (3) authorizes the MPHA to administer its Mobility Demonstration Vouchers and its Turnover Vouchers in the Council's jurisdiction subject to the terms and conditions in this Agreement.

II. DEFINITIONS

2.01 Definitions. For the purposes of this Agreement, the following terms have the meanings ascribed to them in this section, unless otherwise indicated by the context:

- (a) **“Comprehensive Mobility-Related Services Guide”** or **“CMRS Guide”** means the CMRS Guide (Version 3: January 14, 2022), and any successor versions of the CMRS Guide, published on MobilityDemoTA.org (or as otherwise published by HUD) that describes in detail the types of Demonstration services that must be provided and how those services will be provided. The CMRS Guide is incorporated by reference and is part of this Agreement.
- (b) **“Mobility Demonstration Vouchers”** or **“MDVs”** means the 74 vouchers awarded to the MPHA and the Council for implementation of the Demonstration.
- (c) **“Opportunity Areas”** means the most recent version of the opportunity areas within the MPHA and Council jurisdictions as published on the MobilityDemoTA.org website.
- (d) **“Participant Families”** means families eligible for Section 8 HCV assistance with at least one child aged 17 and under currently living with them at the time of the families' enrollment in the Demonstration, and includes both existing voucher holders and families on the MPHA's and the Council's respective HCV program waiting lists who are eligible for the HCV program and meet Demonstration eligibility criteria.
- (e) **“Statement of Responsibilities”** means: the *Housing Choice Voucher Mobility Demonstration Public Housing Agency (PHA) Site Statement of Responsibilities* issued by HUD via e-mail on or about April 7, 2022; any amended or revised versions of the Statement of Responsibilities; and any new or revised PIH Notices or HUD guidance relating to the Statement of Responsibilities and the Demonstration. A copy of the Statement of Responsibilities is attached to this Agreement.

- (f) “*Turnover Vouchers*” means, collectively, regular turnover vouchers made available to new admissions by the MPHA and the Council for the Demonstration, and vouchers issued by the MPHA and the Council to their respective existing voucher holders who are recruited and enrolled in the Demonstration. Turnover Vouchers also may include new, incremental vouchers (if available) if HUD approves the use of any new, incremental vouchers for the Demonstration.

III. TERM, TERMINATION, AND CONTINUING COOPERATION

3.01 Term. This Agreement is effective on the date this Agreement has been signed by both Parties’ authorized signatories. Unless this Agreement is rescinded or terminated earlier under Section 3.02, this Agreement will terminate October 1, 2028 when the Demonstration terminates.

3.02 Termination. Subject to HUD approval as required by the Statement of Responsibilities, this Agreement may be terminated or rescinded by either Party for any reason upon 90 days’ prior written notice to the other Party.

3.03 Continuing Cooperation. Notwithstanding the October 1, 2028 termination date for this Agreement and the Demonstration, the MPHA and the Council intend to provide reasonable assistance and cooperation with future HUD research efforts relating to the Demonstration and ongoing evaluations on the outcomes of Participant Families.

IV. COOPERATIVE EXERCISE OF POWERS

4.01 Implementation. The MPHA and the Council will implement the Demonstration and administer their respective MDVs and Turnover Vouchers within their own and the other Party’s jurisdiction in accordance with the Program Design, Research Design, and other requirements described in HUD’s July 15, 2020 Notice, the Statement of Responsibilities, and the CMRS Guide. However, in lieu of contracting with a third-party provider for some or all of the required services under the CMRS Guide, the Council will provide mobility-related services and the MPHA and the Council have allocated or assigned certain other responsibilities between themselves:

- (a) **Council Responsibilities.** To implement this Agreement and the Demonstration the Council will:
- (1) Provide information about the Demonstration to Council families during voucher issuance sessions which may, as appropriate or necessary, be conducted either on a remote or in-person basis.
 - (2) Provide mobility-related services for Council Participant Families and MPHA Participant Families for both the Comprehensive Mobility-Related Services treatment group (“CMRS Treatment Group”) and the Selected Mobility-Related Services treatment group (“SMRS Treatment Group”) as described in the Statement of Responsibilities and required in the CMRS Guide. Mobility-related services for the CMRS Treatment Group will include:
 - (i) Pre-Move Services: individualized coaching for families;
 - (ii) Search Assistance: assistance identifying available units in Opportunity Areas;

- (iii) Financial Assistance: funding to assist with the cost of security deposits and flexible assistance to cover application fees, transportation costs and other costs that could pose a barrier to moving to an Opportunity Area;
 - (iv) Expedited Leasing: streamlined and expedited processes for leasing paperwork, including request for tenancy approvals, scheduling and conducting inspections and direct assistance to property owners and families throughout the leasing process, when needed for Council families;
 - (v) Property Owner Incentives: a holding fee that compensates owners if voucher holders fail to execute the lease, a lease-up bonus, and a damage mitigation fund;
 - (vi) Property Owner Outreach: proactive outreach to property owners to introduce the Demonstration and identify potential units, maintaining available unit lists, making referrals of available units and coordinating unit tours; and
 - (vii) Post-Move Services: check-ins with the family and owner following the move to assist with the transition to the new community.
- (3) Provide mobility-related services to the SMRS Treatment Group with a HUD-selected subset of the CMRS as described in the Statement of Responsibilities.
 - (4) Employ a project lead, mobility coordinators, and a leasing coordinator (“Mobility Program Staff”) to provide the mobility-related services for the CMRS Treatment Group and the SMRS Treatment Group. The Parties anticipate that approximately 4.0 FTE Mobility Program Staff will be necessary for the term of this Agreement.
 - (5) Require Mobility Program Staff to successfully complete the CMRS training curriculum and provide Mobility Program Staff with training on the Council’s and the MPHA’s procedures as applicable to Mobility Program Staff roles.
 - (6) Implement a web-based address locator tool for Participant Families, property owners, and Mobility Program Staff to determine if properties are located in Opportunity Areas.
 - (7) Prepare and submit to the MPHA an annual expenditure plan (budget) for the Council-provided mobility-related services for the forthcoming program year.
 - (8) Invoice the MPHA on a quarterly basis for the cost of the Mobility Program Staff and the cost of the mobility-related services provided during the invoice period, or as specified by HUD. The Council’s invoices will be based on actual expenditures and will include supporting documentation. The form and content of the invoices will be determined by the MPHA.
 - (9) Provide the MPHA with information requested by the MPHA so the MPHA can meet its reporting responsibilities as the lead PHA under the Demonstration.

If the Parties mutually agree it is appropriate or necessary to use a third-party provider for some or all of the required mobility-related services under the CMRS Guide, the Council or

the MPHA may contract with a third-party provider for some or all of the required mobility-related services. If the Council contracts with a third-party provider, it will invoice the MPHA for those costs as provided in Paragraph (a)(8).

- (b) ***MPHA Responsibilities.*** To implement this Agreement and the Demonstration the MPHA will:
- (1) Provide information about the Demonstration to Minneapolis families during voucher issuance sessions which may, as appropriate or necessary, be conducted either on a remote or in-person basis.
 - (2) Employ one staff member to act as intake coordinator for the Demonstration as it relates to MPHA vouchers.
 - (3) Subject to its receipt of payment for mobility-related services from HUD and HUD's reimbursement process, reimburse the Council in a timely manner for the Council's actual costs of providing mobility-related services.
 - (4) Prepare and submit to HUD an annual expenditure plan and all reports required under the Demonstration, except for Voucher Management System and PIC reporting requirements specific to the Council's vouchers.
 - (5) Implement streamlined and expedited processes for leasing paperwork, including request for tenancy approvals, scheduling and conducting inspections and direct assistance to property owners and families throughout the leasing process, when needed for Minneapolis families.

4.02 Payment Standards. To ensure HUD and its evaluation team can evaluate the effectiveness of the Demonstration, the MPHA and the Council will offer payment standards in Opportunity Areas that are sufficiently high to ensure Participant Families have access to rental units in Opportunity Areas. The MPHA and the Council will establish their own payment standards for Opportunity Areas within their respective jurisdictions, but the payment standards for any one Opportunity Area will be the same for Participant Families and the control group that will be part of HUD's evaluation.

4.03 Collaborative Efforts. On an as-needed basis, or as requested by a Party, the Parties will confer with each other on the status and implementation of this Agreement and the Demonstration, including the implementation of a pilot to test recruitment, enrollment, randomization, data collection, and mobility-service delivery protocols.

4.04 Portability. This Agreement obviates the need for the Parties to provide Section 8 HCV assistance under portability procedures to Participant Families who lease eligible units within the other Party's jurisdiction. Portability procedures and the Parties' respective portability policies will apply: when Participant Families move to a new unit located outside the MPHA's and the Council's jurisdictions; and to voucher holders and families who are not participating in the Demonstration.

4.05 Voucher Administration After Demonstration Terminates. The Demonstration will terminate on October 1, 2028 by which time the MPHA and the Council likely will have some or many Participant Families living in the other Party’s jurisdiction with their respective MDVs and Turnover Vouchers. On or before July 1, 2028, the MPHA and the Council will meet to discuss and determine how to administer their respective vouchers after the October 1, 2028 termination of the Demonstration.

V. DATA PRACTICES AND DATA SHARING

5.01 Government Data; Informed Consent. The MPHA and the Council are subject to the Minnesota Government Data Practices Act (Minnesota Statutes chapter 13). Data on Participant Families, including their home addresses, are classified as private “benefit data” on individuals under section 13.462, subdivisions 1 and 3, of the Minnesota Government Data Practices Act. The Parties will develop and use Tennessee warnings and obtain required informed consents that will permit the Parties to share information on Participant Families with: the authorized personnel of the other Party for the purposes of implementing this Agreement and the Demonstration; HUD personnel and its Demonstration evaluation team; authorized personnel of third-party organizations providing legal services and financial coaching; and authorized personnel of third-party providers (if any) that may provide some or all of the required mobility-related services under the CMRS Guide if the Parties determine it is appropriate to contract for required services. For the purposes of this section, “authorized personnel” means persons whose work assignments reasonably require access to private data on Participant Families to implement and administer the Demonstration and this Agreement. The Parties also will implement the informed consent and enrollment policies and procedures required under the Statement of Responsibilities.

5.02 Data Sharing. Implementation of this Agreement and the Demonstration will require the Parties to share private benefit data on their respective Participant Families. Data on Participant Families shared by the Parties under this Agreement will be administered consistent with the Minnesota Government Data Practices Act and other applicable state and federal laws and regulations. Private data on Participant Families will be accessible only to the Parties’ respective employees, agents, and contractors whose work assignments reasonably require access to the data, and will be accessed by those authorized persons only for the purposes of implementing this Agreement and the Demonstration. If a Party becomes aware of a “breach of the security of the data,” as defined in Minnesota Statutes, section 13.055, involving data on the other Party’s Participant Families, that Party will inform the other Party of the breach of security so the Parties can comply in a timely manner with any notice and other requirements of section 13.055. Nothing in this Agreement limits the Parties’ ability to prepare and disseminate “summary data” as defined in Minnesota Statutes, section 13.02, subdivision 19.

5.03 Access to Participant Families’ Electronic Files. Subject to any applicable software license agreement terms and conditions, the Parties will provide each other with access to view selected elements of the Participant Families’ electronic files on a real-time basis. Each Party should have real-time information on the CMSR Treatment Group and SMSR Treatment Group families’ voucher size, voucher term, inspection dates, current property owner name and address, and whether the families may be in the process for termination of assistance. If the Parties’ respective software license agreements restrict the Parties’ ability to provide access to electronic files, the Parties will provide access using an adequate substitute.

VI. GENERAL PROVISIONS

6.01 Amendments. This Agreement may be amended by written agreement signed by the Parties’ duly authorized signatories. Any substantive amendments to this Agreement must be approved by action of the Council’s governing body and action of the Board of Commissioners of the Minneapolis Public Housing Authority. Any amended or revised versions of the Statement of Responsibilities and any new or revised PIH Notices or HUD guidance relating to the Statement of Responsibilities and the Demonstration that do not raise significant policy considerations for the Parties’ respective governing bodies will not constitute “substantive amendments” and will not require approval or action of the Parties’ respective governing bodies.

6.02 Authorized Representatives. For the purposes of administering this Agreement and receiving notices relating to this Agreement, the Parties’ authorized representatives (or their successors) are:

For the Metropolitan Council:

Terri Smith, Director Metro HRA
390 Robert Street North
Saint Paul, Minnesota 55101
terri.smith@metc.state.mn.us

For the Minneapolis Public Housing Authority:

Abdi Warsame, Executive Director
1001 Washington Avenue North
Minneapolis, Minnesota 55401
awarsame@mplspha.org

If the Council or the MPHA designates a different authorized representative the Council and the MPHA will notify the other Party about the designation. The authorized representatives may not execute amendments to this Agreement unless their respective governing bodies or their respective administrative policies and procedures authorize them to execute amendments.

6.03 Liability. Pursuant to Minnesota Statutes, section 471.59, subdivision 1a, the Council and the MPHA will be responsible for their own acts and omissions and the results of those acts or omissions. Neither the Council nor the MPHA waives any tort liability limitations conferred on them by Minnesota Statutes, sections 466.04, or 471.59, subdivision 1a, or any other liability limitations or immunities conferred on them by state or federal law.

IN WITNESS WHEREOF, the MPHA and the Council have caused this Agreement to be executed by their duly authorized signatories.

**MINNEAPOLIS PUBLIC
HOUSING AUTHORITY**

METROPOLITAN COUNCIL

By: _____
Abdulkadir Yassin Warsame
Executive Director/CEO

By: _____
Mary Bogie
Regional Administrator

Date: _____

Date: _____

ATTACHMENT

**JOINT EXERCISE OF POWERS AGREEMENT
HOUSING CHOICE VOUCHER COMMUNITY CHOICE DEMONSTRATION**

This Attachment comprises this page and the attached copy of the *Housing Choice Voucher Mobility Demonstration Public Housing Agency (PHA) Site Statement of Responsibilities* issued by HUD on or about April 7, 2022.

Housing Choice Voucher Mobility Demonstration Public Housing Agency (PHA) Site Statement of Responsibilities

This Statement of Responsibilities describes the research and program design that apply to the Housing Choice Voucher (HCV) Mobility Demonstration, also known as the Community Choice Demonstration (“demonstration”). The Public Housing Agency (PHA) site has 60 days from the email receipt of this document to withdraw from the demonstration without HUD’s prior authorization.

1. Background

On July 15, 2020, HUD published a Federal Register [notice](#) (“Implementation Notice”) implementing the demonstration authorized by the Consolidated Appropriations Act, 2019. Through that Implementation Notice, HUD made available up to \$50,000,000 to participating PHAs throughout the country to implement housing mobility programs by offering mobility-related services to increase the number of voucher families with children living in opportunity areas.

On April 30, 2021, HUD announced that 9 PHA sites will participate in the demonstration. HUD will conduct a randomized controlled trial (RCT) at all 9 PHA sites. Families with children receiving voucher assistance that agree to participate in the demonstration will be randomly assigned to a treatment group that receives mobility-related services or a control group that receives HCV program related services that the PHA offers to all HCV applicants and participants. The demonstration will have two different treatment groups. The first treatment group will receive comprehensive mobility-related services (CMRS). The second treatment group will receive a subset of the CMRS, which HUD calls selected mobility-related services (SMRS).

While the Implementation Notice, and [subsequent Federal Register notice](#) (“Supplemental Notice”) described the requirements related to the demonstration’s program and research design, this Statement of Responsibilities elaborates on those requirements to help ensure that the PHA successfully implements the demonstration.

2. Term of Participation

The Consolidated Appropriations Act, 2019 provided that the demonstration shall terminate on October 1, 2028. The implementation notice provided that the demonstration shall be six calendar years from the date of award. The date of award was April 30, 2021. The PHA site is therefore required to administer its program from May 1, 2021 through April 30, 2027. If the PHA site has sufficient funding after April 30, 2027, it may continue to provide mobility-related services to families enrolled in the demonstration.

Although the demonstration terminates on October 1, 2028, there may be ongoing evaluations on the outcomes of families that participated in the study for many years beyond 2028. The PHA site is encouraged to cooperate with any future research efforts.

3. Program Design

This section describes the program design that will be delivered to families that participate in the demonstration.

A) Comprehensive Mobility-related Services

The PHA site is required to implement CMRS to families that are enrolled in the CMRS treatment group. The PHA site must make available to each family each element of the CMRS, but the family does not have to participate in each service. The CMRS includes the following types of services:

- Pre-Move Services: individualized coaching for families
- Search Assistance: assistance identifying available units in opportunity areas
- Financial Assistance: funding to assist with the cost of security deposits and flexible assistance to cover application fees, transportation costs and other costs that could pose a barrier to moving to an opportunity area
- Expedited leasing: streamlined and expedited processes for leasing paperwork, including request for tenancy approvals, scheduling and conducting inspections and direct assistance to property owners and families throughout the leasing process, when needed
- Property Owner Incentives: a holding fee that compensates owners if voucher-holders fail to execute the lease, a lease-up bonus, and a damage mitigation fund
- Property Owner Outreach: proactive outreach to property owners to introduce program and identify potential units, maintaining available unit lists, making referrals of available units and coordinating unit tours
- Post-Move Services: check-ins with the family and owner following the move to assist with the transition to the new community

The CMRS Guide is published on MobilityDemoTA.org and describes in detail the types of services that must be provided and how services must be provided. The PHA site must implement the CMRS in full compliance with the published CMRS Guide and any successor versions of the CMRS Guide.

B) Number of Families Enrolled in the Demonstration

The PHA site must strive to enroll 1,911 families into the demonstration no later than April 30, 2027. A family is considered enrolled into the study once they have been randomly assigned to the treatment or control group.

The PHA site must not enroll families if it no longer has enough funding to do so. HUD recognizes that the PHA site may experience challenges beyond its control in achieving 1,911

enrolled families. The PHA site's recruitment and enrollment plan will include a realistic enrollment schedule. If the PHA site is not making good faith efforts to meet its enrollment plan, HUD may take corrective action, including, but not limited to: providing the site with technical assistance, issuing a corrective action plan, requiring additional data reporting or other activities, and/or recapturing funds from the PHA site. HUD will issue a subsequent PIH Notice describing recapture and reallocation terms.

C) Required Administrative Policies and Procedures

The PHA site must implement certain administrative policies and procedures for the demonstration, which include:

- Adequate payment standards: To ensure that participating families can afford housing in opportunity areas, the PHA site must adopt adequate payment standards. The payment standards must be used for families in both the treatment and control group.
- Adequate voucher search time: To give families the ability to conduct a thorough search for units in opportunity areas, PHA site must allow an initial search time of at least 90 days with the possibility of a 30-day extension. Adequate voucher search time must be used for families in both the treatment and control group. HUD regulations require that the same voucher search time be applied to all families in a PHA's program. If the PHA site wants to establish a different voucher search time for the demonstration families, it must submit a regulatory waiver request to HUD.
- Expedited lease-up process: The PHA site must ensure an expedited lease-up process for treatment group families. For example, the PHA site could consider establishing alternative processes such as offering one-on-one assistance to property owners and families to complete the Request for Tenancy Approval (RFTA) form, flagging and prioritizing RFTAs for expedited processing, or dedicating HCV staff to process mobility demonstration lease-ups to ensure staff capacity for an expedited process. The mobility services staff may assist in tracking client documents and coordinating expedited processing with other PHA staff.
- Actions to facilitate expedited inspections: The PHA site must ensure expedited inspections for treatment group families. For example, the PHA site could consider certifying mobility services staff in Housing Quality Standards (HQS) to inspect the unit themselves, otherwise dedicating inspection staff to prioritize mobility demonstration inspections, establishing deadlines for inspection process steps or adopting the flexibilities described in Notice PIH 2017-20, if the PHA hasn't already done so. The mobility services staff may assist in tracking inspection scheduling and timelines with other PHA staff in order to facilitate an expedited process.

The PHA site, whether engaged in a partnership with another PHA or not, is encouraged to develop streamlined portability procedures with PHAs in its regional housing market. These include aligning screening policies and procedures, expedited processes for transmitting paperwork from the initial to receiving PHA, and generous voucher search time and extension policies.

A PHA site that has a lead and partner PHA is encouraged to ensure that any family participating in the FSS program is able to continue its participation in the FSS program when porting. The PHAs are also encouraged, wherever possible, to align their FSS Action Plans.

HUD encourages the PHA site to adopt other administrative policies that increase access to opportunity areas.

When adopting administrative policy changes, the PHA site must implement them in accordance with program regulations on the Administrative Plan at 24 Code of Federal Regulations (CFR) 982.54. If the PHA site is unsure whether a required administrative policy necessitates an update to the Administrative Plan, it should contact HUD for further guidance.

D) Required Waiting List Preference

The PHA site must establish a waiting list preference for mobility demonstration vouchers (MDVs) and for the number of regular turnover vouchers PHAs must make available for the demonstration.

For MDVs and the regular turnover vouchers PHAs are making available, including any subsequent turnover of MDVs, the PHA must establish a waiting list preference that is for families with at least one child aged 13 or under that live in census tracts with a family poverty rate of 30 percent or higher.

If a PHA does not have enough families on the waiting list that meet the required preference, the PHA will select the next available family with at least one child aged 17 or under from the waiting list.

E) Required Partnerships

The PHA site must establish a partnership with financial coaching organization and a legal services organization that offer no or low-cost services to qualified low-income families as part of their standard business practices and not on a specialized basis for the demonstration. If the PHA site is unable to establish a no-cost partnership with either of these types of organizations, the PHA must inform HUD and seek further guidance from HUD on how to comply with this requirement.

For further information on the financial coaching and legal services partnerships, please see the “CMRS Supporting Materials” document posted to MobilityDemoTA.org.

F) Required “Soft” Credit Report

The PHA site must be able to pull credit reports for demonstration participants. Credit report inquiries must be soft inquiries, which do not affect the demonstration participant’s credit.

G) Eligible and Ineligible Families for Participation in the Demonstration

Eligible demonstration participants are families with at least one child aged 17 and under currently living with them at the time of enrollment. This means that a family without children may not participate in the demonstration, receive an MDV, or receive mobility-related services under the demonstration. The PHA site must enroll two types of families with children:

- Existing voucher holders: Families who currently hold housing vouchers and have a child aged 17 or younger living in the household. Existing voucher holders that receive ongoing mobility-related services that are not available to all HCV families through a special purpose voucher program or other partnership of the PHA are ineligible to enroll in the study. The PHA site's recruitment and enrollment plan will identify which, if any, of the PHA site's existing voucher holders are ineligible to enroll in the study. For purposes of this demonstration, the term "existing voucher holders" refers exclusively to current program participants. Existing voucher holders do not include families pulled from the waitlist that have been issued a voucher but have not yet been under an executed HAP contract and therefore not yet admitted to the HCV program.
- New admissions: Families on a PHA waitlist for the HCV program who are eligible for the HCV program and meet the demonstration's further eligibility criteria. Among new admission families, families with at least one child aged 13 or younger who live in a census tract where the family poverty rate is 30 percent or higher¹ will be given a preference for participation in the demonstration. If the PHA does not have any families that meet the preference, new admission families will have at least one child aged 17 or younger. New admissions through a special purpose voucher program or other partnership of the PHA who will receive mobility-related services not available to all of the PHA's HCV applicants are most likely ineligible to enroll in the study. The PHA site's recruitment and enrollment plan will identify which of the PHA site's new admission families are ineligible to enroll in the study.

The PHA site shall not establish additional eligibility criteria.

H) Required Address Locator Tool

The PHA site must implement a web-based address locator tool for families, property owners, and PHA staff to determine if a property is located in an opportunity area. The address locator tool must be accessible from the PHA site or a third-party service provider website. Families and property owners should also be able to use the address locator tool to see if a property is affordable based on the voucher size. The tool should be easy for anyone to use. At a minimum, the tool should include the following information:

- Where a property is located geographically

¹ The poverty rate for families is available in American Community Survey table S1702. To access the information at the census tract level 5-Year ACS Tabulations must be used. To access the latest available family poverty rate at the census tract level see: <https://data.census.gov/cedsci/table?q=poverty%20rate&hidePreview=false&tid=ACSSST5Y2018.S1702&t=Poverty&vintage=2018>.

- If a property is located in an opportunity area
- What rents are affordable in the area by voucher size and unit bedroom size

The address locator tool may include additional items such as community features (grocery stores, schools, transit options, third-party rental site listings, etc.), so families can see where properties are in relation to local resources.

The PHA site may elect to use either an existing no-cost address locator tool or develop one of its own, provided it meets the above-described minimum criteria.

I) New Admissions: Mobility Demonstration Vouchers and Turnover Vouchers

The PHA site received 74 mobility demonstration vouchers (MDVs). The PHA site must enroll at least 111 new admissions, of which 74 are MDVs, funded under the PHA site's demonstration award, and 37 are from the PHA's available turnover vouchers, funded under regular HCV budget authority. New admissions will be enrolled over the course of the five years of implementation in accordance with the PHA site's recruitment and enrollment plan.

The PHA site may elect to reduce the number of existing voucher holders it enrolls by up to 389 and increase the number of new admissions it enrolls by the same number. However, the PHA site will not receive any additional MDVs and any increase in new admission enrollment must be from its available turnover, including turnover of MDVs, or new, incremental vouchers, if available. The use of new, incremental vouchers requires prior approval from HUD.

J) Required Training to Implement the CMRS

Mobility services staff must successfully complete the CMRS training curriculum. The training must include, but is not limited to, the following topics:

- Overview of the HCV program, mobility programs, and the demonstration
- Program orientation and culture
- Overview of CMRS Guide
- Using the service delivery tool
- Hosting CMRS workshops
- Pre-Move Appointment
- Post-Move Appointment
- Property owner engagement and outreach

The PHA site must provide the following training on its own procedures to mobility services staff:

- Overview of demonstration administration and protocols
- PHA move-in processes
- Using the PHA's line of business software (e.g., Yardi, Emphasys, HousingPro)
- Affordability, and rent reasonableness, jointly led with the TA provider

- Portability processes
- Subsidy standards
- Reporting income changes
- Applicable state and local housing law provisions
- Opportunity Areas
- Job-shadowing with PHA staff
- Financial processes and reporting (in collaboration with mobility services provider where applicable)

The PHA site must obtain third-party training on motivational interviewing for mobility services staff.

The PHA site is encouraged, but not required to offer formal financial coaching training to staff in addition to the training on reading credit reports provided by the TA provider as part of the CMRS training.

The PHA site must provide a thorough orientation and onboarding program to any new mobility services staff that includes all the training identified above for the duration of the demonstration.

The PHA site may be required to complete additional trainings necessary for the successful implementation of the Demonstration or as required as part of a corrective action plan.

K) Third Party Mobility-related Services Provider

The PHA site may choose to contract with a third-party provider for some or all of the required services under the CMRS Guide. The third-party provider must have access to view selected elements of demonstration participants' electronic file in the PHA site's line-of-business software or an adequate substitute. The adequate substitute must ensure that the third-party provider will have real-time information on a treatment group family's voucher size, voucher term, inspection dates, current property owner name and address, and whether the family may be in process for termination of assistance.

L) Waivers

Through its submission of an application to the demonstration, the PHA had the opportunity to request regulatory waivers or indicate that it would adopt specific regulatory or statutory waivers provided for in the Implementation Notice. In the future, if the PHA site wishes to request additional regulatory waivers, it may do so at any time. Future requests for waivers for good cause, are subject to statutory limitations and must be requested pursuant to 24 CFR 5.110, and in accordance with [PIH Notice 2018-16](#) (or its successor notice).

M) Selected Mobility Related Services

The PHA site will receive an amendment to this Statement of Responsibilities once the Selected Mobility-related Services has been determined.

4. Research Design

The PHA site has a range of responsibilities related to the evaluation. These include, but are not limited to, enrolling families to participate, adhering to random assignment protocols, collecting data, cooperating with HUD's evaluation team, and communicating regularly with HUD. The PHA site must ensure its staff and service providers are available for interviews and facilitate communication between the evaluation team, property owners, and families when necessary. The PHA site must endeavor to enroll the number of families described in its recruitment and enrollment plan (described further below).

A) Required Training to Implement the Research Design and Study

Each site must complete the following training related to the research design and study:

- Community Choice Demonstration overview
- Understanding the role of the site liaison
- Outreach and recruitment (which includes the Demonstration briefings)
- Enrollment meeting (which includes the baseline information form and survey, informed consent, and random assignment)
- Enrollment tool
- Service delivery tool
- Data security and safe data handling
- Adverse events

The PHA site must provide a thorough orientation and onboarding program to any enrollment that includes all the training identified above for the duration of the demonstration.

The PHA site may be required to complete additional trainings necessary for the successful implementation of the Demonstration or as required as part of a corrective action plan.

B) Recruitment and Enrollment Plan (REP)

Each PHA site is required to recruit and enroll families to participate in the demonstration. The PHA site must use PHA staff to conduct outreach, recruitment and enrollment for families into the study. The mobility services staff, whether employed by the PHA or an outside contractor, may not conduct outreach, recruitment, or enrollment.

The REP is a document that describes how the PHA site will identify families for outreach and recruitment into the demonstration, its planned approach to conduct outreach and recruitment, and any PHA site-specific adaptations to the general process of conducting enrollment and random assignment.

The plan will be updated throughout the demonstration as needed. Revisions to the REP can be requested by the PHA site, should changes in procedures be necessary. However, changes may only be implemented by the PHA site upon approval from HUD and the evaluation team. The most recent version of the HUD-approved REP must always be used.

The PHA site is encouraged to engage in proactive outreach to enroll existing voucher families who are interested in receiving mobility-related services and have enough time left before their current lease expires or they otherwise need to move to receive services. The demonstration includes, by design, a randomized controlled trial experiment to learn what mobility-related services help voucher families with children access areas of opportunity. Given the experimental nature of this study, many factors may contribute to the PHA site's ability to achieve its enrollment targets. While the PHA site must strive to achieve its enrollment targets, it must balance this with maintaining fidelity to the study's intended purpose. To achieve the demonstration's intent, the PHA site should prioritize recruitment and enrollment families who both have enough time prior to their move to benefit from the mobility-related services and are genuinely interested in a potential move to an opportunity area.

As such, when the PHA site is not meeting its enrollment targets despite its best efforts, the PHA site should contact HUD to discuss whether alterations should be made to the PHA site's REP. PHA should not alter, without prior approval from HUD, its recruitment criteria that have been documented in its Recruitment and Enrollment Plan.

C) Pilot

Prior to the official start of demonstration, the PHA site will implement a pilot to test all recruitment, enrollment, randomization, data collection, and mobility service delivery protocols. The pilot will last approximately six months, with an opportunity for individual sites to extend by up to an additional three months to help prepare for the implementation of the program and research model.

i) Timelines and Milestones for Starting the Pilot

The pilot may begin when the PHA, HUD, and the evaluation team have completed all of the required activities necessary to launch the pilot. HUD will inform the PHA site when all HUD and evaluation team required activities have been completed and that will be the "earliest pilot start date."

The PHA site should begin the pilot no later than four months after the earliest pilot start date. To be able to start the pilot, the PHA must do the following:

- Have an adequate number of trained enrollment and mobility services staff to begin enrolling families and providing CMRS to a limited number of treatment group families.
- If the PHA site and HUD mutually agree that the PHA site has an adequate number of staff that have completed an adequate amount, but not all of the required trainings, the PHA site may be permitted to enter the pilot.
- Where applicable, have an executed contract between the PHA site and a third-party mobility services provider and have an executed data sharing agreement with that provider.

- Have implemented the required administrative policies described in the “Program Design” section of this Statement of Responsibilities.
- Have implemented, or have provided HUD with a detailed plan with a timeline to implement, the required waiting list preference.
- Have an agreement in place with a legal services and financial coaching provider.
- Have the ability to do soft credit inquiries.
- Have a documented process for processing the following types of payments timely: baseline survey, family financial assistance, and property owner incentives. Timely means the PHA site should strive to provide these payments within one to five business days wherever possible.
- Have customized program materials including the CMRS Guide, Client Binder materials, Housing Search Workshop, and Renter’s Workshop.

The PHA site is encouraged to, but not required to, have completed the following critical tasks required by this Statement of Responsibilities prior to launching the pilot:

- Documented portability procedures for joint PHA sites.
- Documented family self-sufficiency transfer procedures for joint PHA sites.
- Developed plans to submit voucher issuance and voucher expiration transactions to PIC.
- Documented internal policies to allow for clients to be transported to housing units and neighborhoods by mobility services staff.
- Established an invoicing procedure for issuing monthly or quarterly invoices to HUD.
- Have a link to the address locator tool live on the PHA site’s webpage.

The PHA site should reach out to HUD when it has determined that it has met the above-described criteria. HUD, in its sole discretion, will determine if the PHA site is ready to start the pilot.

If the PHA site is unable to start its pilot within four months of the earliest pilot start date, HUD may take corrective action, including, but not limited to: providing the site with technical assistance, issuing a corrective action plan, requiring additional data reporting or other activities, and/or recapturing funds from the PHA site. HUD will issue a subsequent PIH Notice describing recapture and reallocation terms.

ii) Timelines and Milestones to Exit the Pilot

The pilot is expected to last approximately six months. The pilot period will be considered over, and the PHA may begin full implementation of the demonstration, upon a determination by HUD and the evaluation team. The PHA’s enrollment procedures and mobility-related services will need to be operational and shown to be implemented with fidelity to the CMRS Guide, Recruitment and Enrollment Plan, and Statement of Responsibilities before the full demonstration is launched at the PHA site.

In general, the PHA site is required to achieve the following to exit the pilot, but these conditions may be adjusted in collaboration with and upon approval of the evaluation team:

- Invited at least 245 existing voucher families and 10 new admission families to participate in the study.
- Enrolled at least 70 existing voucher families into the demonstration, including 35 families into the treatment group.
- For those enrolled in the treatment group, at least 30 families must have participated in at least the first meeting with their assigned mobility services staff, with fidelity to the model.
- At least 15 families must have progressed to the stage of actively searching for housing, with referrals provided by the mobility services staff, with fidelity to the model.
- At least 5 families have turned in a RFTA packet for a unit in an opportunity area to provide an opportunity to test the expedited leasing protocols.
- At least 3 families have received a payment from the PHA or mobility services provider for family financial assistance.
- At least 2 property owners have received a payment from the PHA or mobility services provider for property owner incentives.
- Have submitted at least one invoice for mobility-related services to HUD.
- Have completed all required trainings.
- Are properly entering data into VMS and PIC.
- Are properly entering data into the service delivery tool or the PHA equivalent tool.
- Have implemented the required waiting list preference, meaning the PHA has updated their Administrative Plan with the preference and is able to select families from the waiting list that meet the preference.

In the event the pilot shows the PHA site is not yet able to meet a significant number of the targets noted above within the initial six months, HUD may extend the pilot for up to three months to give the site time to work through the challenges and be ready to administer the intervention effectively.

If the PHA site is unable to exit the pilot within six months, or any approved extension period, HUD may take corrective action, including, but not limited to: providing the site with technical assistance, issuing a corrective action plan, requiring additional data reporting or other activities, and/or recapturing funds from the PHA site. HUD will issue a subsequent PIH Notice describing recapture and reallocation terms.

D) Informed Consent and Enrollment Procedures

The PHA site must implement the informed consent and enrollment policies and procedures that will be published and available on MobilityDemoTA.org.

E) Opportunity Areas

The PHA site's opportunity areas will be published on the MobilityDemoTA.org website. PHAs may not change their opportunity areas without the explicit approval of HUD. The PHA site must use the most recent version of the opportunity areas published on the MobilityDemoTA.org website.

F) Service Delivery Tool

The PHA site is encouraged to, but not required to, use the study-developed service delivery tool, which will collect most of the information needed for the evaluation. If the PHA elects not to use the service delivery tool, it must collect, at a minimum, all of the elements that the tool would collect. These data elements are listed in Attachment 1.

G) Additional Data Collection

The evaluation team may collect additional data from the PHA site. When applicable, the PHA site must enter into a data sharing agreement with the evaluation team.

5. Providing Reasonable Accommodations and Ensuring Access to People with Limited English Proficiency (LEP)

Individuals with disabilities will be provided reasonable accommodations to participate in the demonstration and study, including effective communication methods throughout. The PHA site will have primary responsibility for receiving and responding to requests for reasonable accommodations and effective communication methods in the provision of mobility-related services and throughout the recruitment and enrollment process. Where the evaluation team's assistance is needed to respond adequately to study-related questions, the enrollment staff should request assistance.

All materials, notices, and communications to families regarding the demonstration must be clearly communicated and provided in a manner that is effective for persons with hearing, visual, and other communication-related disabilities consistent with Section 504 of the Rehabilitation Act (Section 504) and HUD's Section 504 regulation, and Titles II or III of the Americans with Disabilities Act (ADA) and implementing regulations. Section 504 and the ADA require recipients to ensure effective communication with applicants, participants, and members of the public and to provide appropriate auxiliary aids and services where necessary to afford individuals with hearing, vision, and other communication-related disabilities an equal opportunity to access information. PHAs must provide appropriate auxiliary aids and services necessary to ensure effective communication in all notices and communications, which includes ensuring that information is provided in appropriate accessible formats as needed, e.g., Braille, audio, large type, assistive listening devices, and sign language interpreters, accessible websites and other electronic communications (see 24 CFR 8.6, 28 CFR 35.160, and 28 CFR 36.303). PHAs must continue to take reasonable steps to ensure meaningful access to their programs and activities to Limited English Proficient (LEP) individuals. As an aid to recipients, HUD published Final Guidance to Federal Financial Assistance Recipients: Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons (LEP Guidance) in the Federal Register on January 22, 2007 (72 FR 2732). LEP guidance and information is available here: <https://www.federalregister.gov/documents/2007/01/22/07-217/final-guidance-to-federal-financial-assistance-recipients-regarding-title-vi-prohibition-against>.

6. Fidelity to Program and Research Design

Ensuring that the demonstration policies and procedures are implemented with fidelity is crucial to the evaluation's internal validity. If the PHA site does not implement the program and research design with fidelity to the program and research design, HUD may take corrective action, including, but not limited to: providing the site with technical assistance, issuing a corrective action plan, requiring additional data reporting or other activities, and/or recapturing funds from the PHA site. HUD will issue a subsequent PIH Notice describing recapture and reallocation terms.

7. Prior Approvals

Certain activities undertaken by the PHA site have the potential to interfere with the evaluation. Prior to implementing any of the following activities, the PHA site must inform HUD in writing and receive approval from HUD. These activities are:

- Engaging in a research study that evaluates any aspect of mobility-related services provided under the demonstration.
- Engaging in a research study that evaluates locational outcomes of families in the PHA site's HCV program.
- Implementing any elements of the CMRS Guide that would be offered to families in the control group (i.e., any mobility-related services to be offered broadly to the PHA's regular HCV families).
- A change of waiting list preference process that would impact the required preference.
- Using funds for mobility related services (for either treatment or control groups) not provided to the PHA for the demonstration.
- Changing the method by which the PHA ensure payment standard are high enough for demonstration participants to access opportunity areas
- Changing the opportunity areas or voucher search times for demonstration participants.
- For joint PHA sites, if the partner PHA wants to discontinue participation in the demonstration.

8. Notification

The PHA site must promptly notify HUD in writing when any of following occur:

- A change in the main point of contact
- A change of the PHA executive director
- A change of the third-party service provider or determination to use a third-party service provider after the pilot launch, if applicable
- An interruption of service (e.g., natural disaster)
- A substantive change in HCV policies that could be reasonably assumed to impact leasing (e.g., rent reasonableness policies, outsourcing of inspections)
- Any issue with random assignment is identified
- The PHA site is no longer using previously approved waivers

- The PHA intends to open a previously closed waitlist
- An Agreement to Enter into a Housing Assistance Payments Contract (AHAP) or HAP contract for PHA PBV units in opportunity areas is executed

9. Withdrawal from the Demonstration

If the PHA site determines it is interested in withdrawing from the demonstration at any time, it must notify HUD in writing. The PHA site must describe its reasons for wanting to withdraw from the demonstration. The PHA site may not terminate enrollment or CMRS prior to HUD's approval to withdraw from the demonstration.

10. Reporting Requirements

The PHA site must adhere to the reporting requirements described in the implementation notice. Clarifications to the implementation notice reporting requirements and additional reporting requirements are described below.

A) Voucher Management System Reporting

The PHA site must follow HUD guidance for reporting MDV HAP and unit months leased and mobility-related services expenditures in the Voucher Management System (VMS). Guidance is provided in the VMS User's Manual.

B) PIC Reporting

The PHA site is required to submit 100 percent of its HUD form 50058 or HUD form 50058-MTW into the Public and Indian Housing Information Center (PIC) system, or its successor system, including submission of voucher issuance date and voucher expiration date. For families that receive an MDV, the PHA site must also report the code "MDV" on line 2n, 2p, or another field as instructed. The PHA site must submit to PIC timely and in accordance with HUD requirements.

C) Performance reporting

All HUD-funded programs, including the demonstration, require recipients to submit at least annually a report documenting achievement of outcomes under the purpose of the program. The annual report may not exceed two pages. The reporting period is the program year of May 1 – April 30 and the performance report is due by August 1 each year.

11. Regional PBV Plan

If the PHA site received funding for a regional project-based voucher (PBV) plan, the site must provide the plan to HUD no later than April 30, 2024. The plan must include, at a minimum, (1) an analysis of PBV units that are large enough for families with children and are currently in

opportunity areas in the region and (2) a strategy for increasing the number of those types of PBV units throughout the region.

12. Eligible Use of Funds

A) Mobility Demonstration Voucher HAP and Administrative Fee Funding

Funds awarded for HAP and administrative fees must be used in accordance with the Appropriations Acts, the Implementation Notice, the Supplemental Notice, and other HUD requirements. For Moving to Work (MTW) PHAs awarded MDV HAP funds and administrative fees under this demonstration, these funds are not eligible for fungibility. MDVs may be administered in accordance with activities in the approved MTW Plan or Supplement unless MTW provisions are inconsistent with the Appropriations Acts or the requirements of the Implementation Notice or Supplemental Notice. In the event of a conflict between approved MTW activities and flexibilities and the Appropriations Acts or the Implementation Notice or Supplemental Notice language, the Appropriations Acts and notices govern.

PHAs participating in the demonstration may use administrative fees, its administrative fee reserves, and funding from private entities to provide mobility-related services in connection with the demonstration program, including services such as counseling, portability coordination, property owner outreach, security deposits, and administrative activities associated with establishing and operating regional mobility programs. It is important to note that PHAs must have prior approval to use funding from private entities to provide mobility-related services in connection with the demonstration program.

PHAs participating in the demonstration may use housing assistance payments (HAP) funds under section 8(o) of the United States Housing Act of 1937 ([42 U.S.C. 1437f\(o\)](#)) for security deposits if necessary, to enable families participating in the treatment group to lease units with vouchers in designated opportunity areas. PHAs must inform HUD if they intend to use HAP for security deposits.

PHAs may not project-base any awarded MDVs. Families that receive mobility-related services under the demonstration may, however, move to project-based voucher (PBV) units. MDVs, regular turnover vouchers, and any approved new incremental vouchers made available by the PHA specifically for the demonstration, may not be used as project-based vouchers (PBVs) or as HCV homeownership program vouchers, due to design constraints of the evaluation. The evaluation will assess the mobility-related services families receive and not efforts made by PHAs to secure physical property in opportunity areas. Evaluating the means by which a PHA can secure specific units in opportunity areas requires a different research methodology.

Families participating in the demonstration may move to a PBV unit or purchase a home through the HCV homeownership program. Any MDV voucher holder that chooses to move to a project-based unit or purchase a home through the HCV homeownership program must be offered another voucher from the PHA in accordance with the PHA's policies.

B) Mobility Related-Service Funding

Funds awarded must be used to provide eligible mobility-related services for families with children. The majority of funds will be spent providing direct mobility-related services including family financial assistance and property owner incentives. The PHA site may only use mobility-related services funding for activities described in the Comprehensive Mobility-Related Services (CMRS Guide) or in the Supplemental Notice. Mobility-related services funding is not eligible for fungibility under the MTW demonstration.

The CMRS requires that post move services be offered to treatment group families for at least one year after a move to an opportunity area and access to a damage mitigation fund for at least 18 months after lease-up. The PHA site is encouraged to maintain enough mobility-related services funding to offer post move services and the damage mitigation fund for all enrolled treatment group families, where possible.

13. Recapture and Reallocation of Funds

Funds awarded for the demonstration may be recaptured and reallocated and units awarded may be reduced if the PHA does not comply with the requirements of the demonstration. HUD will issue a PIH Notice that further describes recapture and reallocation terms.

14. Annual Expenditure Plan

The PHA will submit an annual expenditure plan (budget) for its mobility-related services funding to HUD by February 1 for the forthcoming program year. HUD may extend the deadline upon request and with good cause justification by the PHA site. At a minimum, the annual expenditure plan must include the PHA's anticipated expenditures for the following:

- Salaries and benefits for each mobility services staff member
- Direct program costs including
 - Credit reports
 - Family financial assistance
 - Holding fees
 - Inspection pass kits, if applicable
 - Security deposits
 - Lease-up bonuses
 - Damage mitigation fund
- Other direct costs
 - Office supplies
 - Marketing
 - Computers
 - Cell phones
 - Shredders
 - Mileage
 - Training and travel
- Indirect costs

15. Payment Schedule Policies

The PHA site will receive payment for MDV HAP and Administrative Fees as it does for all other HCVs. The PHA site will report its actual expenditures and unit months leased into the Voucher Management System (VMS) on a monthly basis. HUD disburses funding to the PHA based on the information submitted into VMS.

The PHA site will receive payment for mobility-related services funding based on a reimbursement process and the PHA's actual expenditures. The PHA site will submit invoices to HUD based on its actual expenditures compared with their annual expenditure plan. The invoices should also include detail on family financial assistance expenditures including application and processing fees, coaches discretionary fund, and transit subsidies. HUD may also require supporting documentation such as contracts or receipts to confirm the accuracy of the invoice.

The PHA site may submit invoices to HUD on a monthly or quarterly basis. In certain cases, HUD may accept a semi-annual invoice, but only with prior approval by the evaluation team as invoices are an important data element for the evaluation.

To receive timely payment, the PHA must submit an invoice, based on actual expenditures, to HUD no later than the 10th of each month.