FAQs: Mainstream Extraordinary Administrative Fees Awarded through PIH Notice 2022-07 and 2022-19

1. Can the extraordinary administrative fees be used to pay for regular administrative expenses in connection with the Mainstream program?

Yes. Per PIH Notice 2022-07 and 2022-19, extraordinary Mainstream administrative fees must be used to support the Mainstream Voucher Program for two purposes: (1) any currently eligible voucher administrative costs, including activities to support housing search and lease up of eligible applicants; and (2) costs related to the retention, recruitment, and support of participating owners in the form of security deposits, signing bonuses, vacancy payments, and damage mitigation.

2. Do all extraordinary administrative funds need to be used within 12 months of the award?

No. The Mainstream Voucher Program extraordinary administrative fees remain available to support the administration of the Mainstream Voucher Program, consistent with uses and restrictions of the funds as described in PIH Notices 2022-07 and 2022-19.

3. How do the extraordinary administrative fees awarded through PIH Notice 2022-07 and 2022-19 connect to Mainstream reserves?

Extraordinary admin fees awarded through PIH Notice 2022-07 and 2022-19 follow the same provisions for becoming part of the Mainstream administrative fee reserves as regular Mainstream administrative fees.

4. Can the PHA use their own interpretation of these eligible expenses? For example, could damage mitigation include costs associated with bed bug removal or issues that are particular to the PHA?

No. Consistent with PHA's general guidance on damage mitigation, funds used for this purpose are for repairs and lost rental income due to damage to a unit during a participating family's tenancy. PHAs may disburse funds to an owner to pay for unit damage incurred beyond what is covered by the family's security deposit. Reimbursable expenses include material costs, labor costs for hired services, and lost rental income up to one month's rent. Disbursements for such costs that exceed the family's security deposit should be made only after the owner has exhausted the family's security deposit.

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5. Where are the extraordinary administrative fee expenses reported in VMS?

Mainstream extraordinary administrative fee expenses, including landlord incentives, will be reported in the Mainstream Administrative Expenses field in VMS.

6. Were PHAs awarded \$500 per voucher for every Mainstream voucher we have, not just those that were awarded in recent NOFAs?

As stated in both PIH Notices 2022-07 and PIH 2022-19, PHAs that applied for extraordinary administrative fees under either notice were provided \$500 per each voucher that was awarded through the following NOFA's and notices: FY 2017 Mainstream Voucher NOFA (FR-6100-N-43), the FY 2019 Mainstream Voucher NOFA (FR6300-N-43), PIH Notice 2020-09, PIH Notice 2020-22, and PIH Notice 2022-07, and PIH Notice 2022-19.

7. Are we limited to using just \$500 per voucher holder? Or can the extraordinary administrative fee funding be pooled together to assist newly issued vouchers holders with security deposits, etc.?

No, PHAs are not limited to spending the extraordinary administrative fees at \$500 per voucher. See <u>PIH Notice 2022-18</u> for additional guidance on using administrative fees to pay for security deposits.

8. Do extraordinary Mainstream administrative fee funds and expenses need to be reported separately from regular Mainstream Voucher Program administrative fee funds and expenses?

No, the extraordinary Mainstream administrative fee uses are not reported separately. These expenses will be reported in the Mainstream Vouchers Administrative fee expenses field in VMS.

9. Our PHA is considering using the extraordinary administrative fees to provide security deposit assistance for Mainstream applicants. Is there guidance on whether these payments may/must be returned to the PHA at participant move out? If so, would that be considered regular AF for the PHA or would it have to be reused for eligible activities outlined in PIH 2022-19, normal AF eligible activities, or can it be treated more like general funds the PHA could use for any PHA costs?

Section 3(b)(ii) of PIH Notice 2022-18 states that, "The PHA may place conditions on the security deposit assistance, such as requiring the owner or family to return the security deposit assistance to the PHA at the end of the family's tenancy (less any amounts retained by the owner in accordance with the lease)." PHAs must comply with any relevant state or local law regarding security deposit assistance. Security deposit

assistance returned to the PHA remains restricted to Mainstream extraordinary administrative fee eligible uses.

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