

**Webinar Mainstream FAQs  
Updated November 12, 2024**

***Notice PIH 2024-30***

**1. Does this notice apply to project-based Mainstream vouchers?**

No. The authority provided to HUD in the [Consolidated Appropriations Act, 2024](#) only allows HUD to waive certain statutory and regulatory provisions for tenant-based Mainstream vouchers.

**2. The notice prohibits PHAs from applying residency preferences to Mainstream applicants, but are PHAs still permitted to prohibit porting in the first year for non-resident applicants?**

Yes. Per 24 CFR 982.353(c)(2)(iii), PHAs may choose to restrict portability for non-resident applicants during the first 12 months after the family is admitted. HUD has not waived this regulation or established any alternative requirement related to this provision.

**3. Is there a required timeline for PHAs to adopt any of the discretionary policies?**

No. PHAs may choose to adopt the discretionary policies at any time. Per Section 7 of [Notice PIH 2024-30](#), PHAs that choose to adopt any of the optional waivers must describe those policies in their administrative plan (24 CFR 982.54(d)(1)).

**4. As an MTW agency administering Mainstream vouchers, can we continue to apply our residency preference to Mainstream vouchers (provided that we go through the process of updating our MTW plan and adopt these changes as MTW flexibilities)?**

No. MTW PHAs may not apply any flexibilities that are inconsistent with the waivers and alternative requirements described in [Notice PIH 2024-30](#). These waivers and alternative requirements were established consistent with the authority in section 243 of HUD's FY 2024 Appropriations Act, which required HUD to determine that a waiver or alternative requirement is necessary for the effective delivery and administration of Mainstream funding.

**5. Does the 120-day minimum search term apply only to Mainstream applicants? What about current Mainstream tenants who wish to move within our jurisdiction?**

Per Section 6b of [Notice PIH 2024-30](#), the initial search term requirement also applies to current Mainstream participants choosing to move with continued assistance in accordance with 24 CFR 982 subpart H.

**6. The Notice says that PHAs must provide a current listing of available accessible units. Can this list be a website?**

Directing a household to a website alone is not sufficient. PHA's must ensure its Mainstream Voucher program is readily accessible to and usable by individuals with disabilities. A PHA may accomplish program access obligations and outreach requirements, set forth in Section 504 at 24 CFR 8.28, through a variety of actions. The PHA may provide a listing of current available accessible units on the PHA's website, or another resource that meets these requirements. The list should be provided directly to the applicant household as part of their program briefing materials.

**7. Will PHAs need to amend their Admin Plans first before implementing the mandatory policies?**

No. Per Section 5 of [Notice PIH 2024-30](#), PHAs must comply with the requirements of the mandatory policies within 120 days of the notice's publication, but there is no requirement that the administrative plan must be revised prior to compliance with the mandatory policies. In the case of mandatory waivers or alternative requirements, PHAs do not have discretion whether to implement the provisions or not. Any administrative plan changes therefore would be focused on simply conforming to a PHA's administrative plan with the mandatory waivers and alternative requirements. PHAs are encouraged to be expeditious in adopting any necessary conforming changes to their administrative plan.

**8. If the notice was effective from the publication date, are the new requirements applicable to anyone who had a voucher at the time of the Notice's publication?**

No. The date of the Notice's publication is not the relevant standard. The Notice states that PHAs must adopt the mandatory policies within 120 days from the Notice publication date. Therefore, mandatory policies would not apply to applicants or program participants until the date that the PHA's policies under the notice become effective (which must be within 120 days of the publication date of August 20, 2024).

**9. Can our agency establish a residency preference if we are not adopting a separate waiting list for Mainstream?**

The prohibition on applying a residency preference to Mainstream applicants applies regardless of whether the PHA chooses to establish a separate Mainstream waiting list. A PHA with a residency preference that chooses to maintain one HCV waiting list that includes Mainstream applicants must not apply the standards of the residency preference to Mainstream applicants. In other words, Mainstream applicants must receive the residency preference points regardless of residency status or PHAs may use a similar method which ensures that all Mainstream applicants regardless of residency status receive the benefit of the residency preference.

**10. If a PHA has an HCV waiting list that has a preference point hierarchy that includes a residency preference, would the PHA need a separate waiting list for mainstream?**

No, a separate waiting list would not be required. When a Mainstream-eligible applicant applies, the PHA would determine their position on the waiting list based on applicable preferences per the PHA's administrative plan. (See the response to Question #9 for further details on how PHAs could complete this administratively).

**11. If a Mainstream household no longer contains an eligible member (e.g., the disabled person has left the household), will the PHA still be able to transition the family to regular HCV if the family was issued a Mainstream voucher from a separate Mainstream waitlist?**

If the family member that qualified a family for Mainstream leaves the household, PHAs may choose to: 1) allow the remaining family members to continue with Mainstream assistance, or 2) offer the family an HCV to free up the Mainstream voucher for use by another Mainstream-eligible family. Both options assume that a remaining family member is old enough to become a leaseholder under applicable state law and is otherwise eligible to receive assistance. Both of these options remain available even if the PHA has chosen to establish a separate Mainstream waiting list.

***General Mainstream Voucher Questions***

**12. Who determines disability status for Mainstream applicants?**

PHAs should state in their administrative plan how they verify disability status for the purposes of determining Mainstream eligibility. Typically, PHAs verify disability status through EIV verification or through verification provided by a health care or service provider with knowledge of the applicant's disability.

**13. Would Medicaid rental assistance as provided by a Centers for Medicare & Medicaid Services (CMS) waiver be considered a duplicate benefit for someone with a Mainstream voucher?**

Whether rental assistance paid for by Medicaid is considered a duplicate subsidy depends on when the Mainstream family receives the assistance. Rental assistance received prior to receiving Mainstream assistance that ends prior to Mainstream assistance beginning is not considered a duplication of benefits. Payments for rental assistance or utilities that go directly to the owner for rent and continue after the Mainstream assistance begins are considered a duplication of benefits and are prohibited.

**14. Can Mainstream vouchers be used for private or shared units in an assisted living facility or a similar non-medical institutional congregate setting that furnishes medical services and supports?**

Yes. Mainstream vouchers may be used in assisted living or other congregate care facilities provided that the facility meets HUD's definition of such facilities as described in [Notice PIH 2012-40](#).

**15. Could a PHA have a Mainstream preference for applicants in Permanent Supportive Housing?**

Yes, provided that per [Notice PIH 2024-30](#), the PHA makes information publicly available regarding the referral source (if any) for the preference, including the names and contact information of their partnering agencies.

**16. Can Mainstream participants port out to a jurisdiction in which the receiving PHA does not administer Mainstream vouchers?**

If a Mainstream family chooses to port to a PHA that does not administer Mainstream vouchers, the receiving PHA may choose to bill the initial PHA or absorb the family into their HCV program. The receiving PHA would not be permitted to deny the incoming port.

**17. My agency has some Mainstream vouchers available but is fully leased for HCV. Can we move some HCV families who are eligible for Mainstream to a Mainstream voucher?**

No. Per Section 5(c) of [Notice PIH 2020-01](#), all Mainstream turnover vouchers must be issued to the next Mainstream-eligible family on the PHA's HCV waiting list (or the PHA's Mainstream waiting list, whichever is applicable).