

## Summary of MTW Cohort #2 Rent Reform

Ed Gramlich, NLIHC, January 15, 2021

HUD's Office of Public and Indian Housing (PIH) posted a Notice soliciting public housing agencies (PHAs) to apply for the Moving to Work (MTW) Demonstration Cohort #2, [Notice PIH-2020-21](#) on August 28, 2020. Only PHAs that submitted a Letter of Interest according to [PIH Notice-2019-04](#) and the [36 that were notified by HUD that they are eligible](#) for the second cohort could submit an application. Of the 36 eligible PHAs, an MTW Plan and application package were due by January 8, 2021. PIH anticipates selecting 10 PHAs, each of which must have a combination of 1,001 or more public housing and Housing Choice Voucher (HCV) units.

### Brief background on MTW Expansion

The "Consolidated Appropriations Act of 2016" authorized HUD to expand the MTW demonstration to an additional 100 high performing PHAs over a seven-year period to end in 2022. PHAs will be added to the MTW demonstration in groups (cohorts), each of which will be overseen by a research advisory committee to ensure the demonstrations are evaluated with rigorous research protocols, quantitative analysis, and comparisons to control groups. Each cohort of MTW sites will be directed by HUD to test one specific policy change.

The MTW statutory objectives are to reduce costs, give households incentives to achieve economic self-sufficiency, and to increase housing choice. The statute requires MTW agencies to: 1) serve the same number of low-income families as they would without MTW funding flexibility; 2) serve a mix of families by size comparable to the mix they would have served if they were not in MTW; 3) ensure that 75% of the families they assist have income at or below 50% of area median income; 4) ensure that assisted units meet housing quality standards; and 5) establish a reasonable rent policy.

There are now five cohorts.

- Cohort 1 will evaluate the overall impact of MTW flexibilities on PHAs with fewer than 1,000 units.
- Cohort 2, rent reform, will evaluate the impacts of different rent structures.
- Cohort 3 will evaluate the impacts of work requirements.
- Cohort 4 will evaluate incentives to landlords to participate in the HCV program.
- Cohort 5 will evaluate the overall impact of MTW flexibility on PHAs with fewer than 27,000 units.

PIH posted the final "[Operations Notice for the Expansion of the Moving to Work \(MTW\) Demonstration Program](#)" in the *Federal Register* on August 28 (see *Memo*, [8/31/20](#)). This version of the Operations Notice establishes requirements for implementing the MTW demonstration for PHAs applying for one of 100 new MTW slots. The original Operations Notice was published on January 23, 2017 (see *Memo*, [1/23/17](#), [5/8/17](#)). The final notice was effective immediately.

PIH issued Notices soliciting PHAs to apply to participate in Cohort #1 (see *Memo*, [10/22/18](#)) and Cohort #2 (see *Memo*, [3/18/19](#)). PIH [announced](#) on January 14, 2021 it had selected 30 small PHAs for Cohort #1 (MTW flexibilities) and indicated that it anticipated announcing PHAs to undertake Cohort #2 (rent reform) in the spring. The [list of the 30 small PHAs](#) selected to participate in Cohort #1 does not reveal specific MTW flexibilities those PHAs will use; the brief descriptions merely present platitudes and generalities.

## **Notice PIH 2020-04: Cohort #2 – Rent Reform**

This Notice lays out the process by which 10 PHAs, each of which must have a combination of 1,001 or more public housing and Housing Choice Voucher (HCV) units, will be selected for the second cohort of the MTW Demonstration Expansion. Cohort #2 will evaluate alternative rent policies designed to increase resident self-sufficiency and reduce PHA administrative burden. NLIHC does not see how the rent reforms in Cohort #2 will increase resident self-sufficiency.

Household types in the following categories cannot participate in the rent reform demonstration: elderly households, households with a disabled person, households paying a flat rent or ceiling rent, households with a special purpose voucher [Family Unification Program (FUP), Veterans Affairs Supportive Housing (VASH), and Mainstream and Non-Elderly (NED) vouchers], and families already participating in the Family Self-Sufficiency (FSS) program.

Within an MTW PHA, all eligible households will be randomly assigned to either a control group (to which the existing rent policy will apply) or to a treatment group (to which an alternative rent policy will apply). This will take place during an “enrollment period” that PIH expects will last one year. During the enrollment period, any new households admitted will be randomly assigned to the control group or treatment group. After the enrollment period, an MTW PHA may choose whether to subject newly admitted households to the alternative rent policy (treatment group) or regular rent rules (control group). The rent reform MTW demonstration is expected to last six years after the enrollment period.

Each selected MTW PHA will implement one of the following alternative rent policies and provide for hardship exceptions as discussed in Attachment 1 of the Notice (see page 6 of this summary). More details about each of the three MTW Test Rent options are on pages 5-6 and 8-12 of this summary.

### **MTW Test Rent #1 – Tiered Rent:**

Households are grouped by income into tiers. Within each tier, rents are fixed. Any income increase within a tier does not affect a household’s rent. Income reexaminations will take place every three years. If a household’s income increases into a higher tier, its rent will not change until the third-year income reexamination.

### **MTW Test Rent #2 – Stepped Rent:**

Rents are increased annually by a fixed amount. A PHA will choose the size of the annual stepped rent increase, but it may not be less than 2% of the Fair Market Rent (FMR) or greater than 4% of the FMR (adjusted for unit size). Each year, a PHA may review and adjust the annual stepped rent increase.

Each household’s year-one rent will be set at 30% of their **gross income** (not adjusted income), or a PHA’s minimum rent. After the first year, each household’s rent will increase by the annual stepped rent increase, regardless of their income. Note that by using gross income instead of adjusted income, households will already be in danger of paying more rent.

### **MTW Test Rent #3 – PHA Proposed Alternative Tiered/Stepped Rent, *next page***

### **MTW Test Rent #3 – PHA Proposed Alternative Tiered/Stepped Rent**

PHAs may propose a tiered or stepped rent that is different from the two HUD test rent policies above. A PHA proposing an alternative policy must be able to ensure a sample size of at least 4,000 existing non-elderly, non-disabled households. In addition, any alternative policy proposed by a PHA must be a tiered rent or stepped rent and must fit within the boundaries established by HUD as outlined in Attachment 1 of the Notice (see page 6 of this summary).

### **Rent MTW PHAs Cannot Use Some Other MTW Waivers**

The Notice (page 7) lists six MTW Waivers that Cohort #2 PHAs will not be able to use and lists several other MTW Waivers a PHA would need HUD approval to implement. NLIHC has two Summaries of the MTW Operations Notice describing all MTW Waivers. (NLIHC's summary of the final Operations Notice starting with the five sets of waivers most harmful to residents is at <https://bit.ly/3aSFijL> and NLIHC's summary of the final Operations Notice following Appendix 1 order is at <https://bit.ly/2Mo6Mlk>.) Cohort #2 MTW PHAs may propose Safe Harbor Waivers and Agency-Specific Waivers (see NLIHC's Summaries); however, HUD will not consider MTW Waivers that create a mandatory self-sufficiency program, propose a time limit and/or work requirement, or alter rents/reexaminations.

## **MTW Plan**

PHAs interested in applying to participate in Cohort #2 had to submit an MTW Plan by January 8, 2021. The contents of the MTW Plan are summarized in this section of the summary.

### **Resident and Public Engagement**

The second cohort MTW Plan and application package must undergo a resident and public engagement process that must include all of the following:

- A PHA must notify public housing residents and/or HCV households of its intention to participate in the MTW Demonstration. This notification must be before a PHA develops an MTW Plan.
- A PHA must hold at least two resident/HCV household meetings (separate from, and before, a required public hearing).
- After the two resident/HCV household meetings, a PHA must publish a notice that a hearing will be held about a full MTW Plan.
- A draft MTW Plan and all relevant information must be available for public inspection for at least 30 days before an MTW Plan is submitted to HUD.
- A PHA must conduct a public hearing to discuss an MTW Plan and invite public comment.
- A PHA's Board of Commissioners (or equivalent governing body) must approve an MTW Plan by resolution no less than 15 days after that public hearing.

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### **Resident and Public Engagement, *continued***

An MTW Plan must discuss how a PHA plans to continue to engage assisted households in its housing programs, as well as engage the broader community and stakeholders, in implementing its MTW program. An MTW Plan must describe any planned outreach and engagement efforts with racial and ethnic minorities, persons with limited English proficiency, persons with disabilities, families with children, and groups representing such persons.

A PHA must provide documentation of the elements of the required resident and public process.

PIH will give a PHA up to 20 points (out of 100) based on resident and community support for a PHA's MTW Rent Reform application. (A PHA's application can get up to 50 points based on its MTW Plan and up to 30 points based on its capacity.)

### **Plan for PHA's MTW Program**

An MTW Plan must describe the types of initiatives a PHA seeks to implement in its MTW program and explain why it wants to undertake those initiatives. An MTW Plan does not have to include discrete activities, but should discuss how a PHA intends to use MTW flexibility to address local needs. This discussion should be organized under the three statutory objectives of the MTW Demonstration program, including: Cost Effectiveness, Self-Sufficiency, and Housing Choice.

### **Proposed Use of MTW Funds**

A PHA must request authority to use public housing and HCV funds flexibly and list or describe its proposed uses of MTW Funds, including describing whether/how the PHA plans to use funds in a flexible manner across the traditional Section 8 (HCV) and Section 9 (public housing) programs. In other words, use public housing funds for HCV-type activities or use HCV funds for public housing-type activities.

### **Evidence of Significant Partnerships**

A PHA must discuss any significant partnerships between it and other public agencies, city/state/local governments, private nonprofits and/or for-profit entities (particularly local welfare offices and local providers of job training and related services). A PHA should clearly explain how such partnerships will help to achieve its vision for the local MTW program. A PHA must discuss how it intends to leverage funding and/or other in-kind resources to implement its MTW program.

## **Rent Reform Information**

An MTW Plan must identify the alternative rent reform policy a PHA seeks to implement. A PHA must go through a public process, as discussed above; therefore, it is important to clearly describe the selected alternative rent policy to the public. All of the following must be included in an MTW Plan:

- An estimate of when the enrollment period will begin and how the alternative rent policy will be rolled out;
- An explanation of which households will be eligible to participate in MTW and an explanation that random assignment will be used to determine which households will pay the alternative rent;
- An explanation of how the alternative rent can benefit households; and,
- An explanation of how the hardship policy will help households if household income decreases or if it is determined a household cannot keep pace with the rent increases.

### ***MTW Test Rent #1: Tiered Rent***

If a PHA selects MTW Test Rent #1, its MTW Plan must include a presentation of a Tiered Rent table, including the minimum and maximum income for each tier and the rent associated with each tier (30% of the monthly income at the midpoint of the tier). More detail from Attachment 1 of the Notice is on page 8 of this summary.

### ***MTW Test Rent #2: Stepped Rent***

If a PHA selects MTW Test Rent #2, the MTW Plan must include:

- A description of how large stepped rent increases will be (using current FMRs, calculate the minimum [2% of FMR] and maximum [4% of FMR] annual stepped rent increase in dollars by unit size);
- An explanation that rent increase numbers may change if FMRs change, but that they generally indicate minimum and maximum annual rent increase that a PHA might use;
- An indication whether a PHA intends to use the lower end or higher end of the stepped rent range (2%-4%);
- An indication whether a PHA intends to review and update the size of stepped rent increases each year (or set them for the full six-year MTW study period). To the extent possible, dollar amounts should be used and be easy for the general public to understand; and,
- An explanation of how rent will be calculated in the first year, how rents will increase in subsequent years, and how the hardship policy will provide relief for households that need it.

### ***MTW Test Rent #3: PHA-Proposed Alternative Rent***

If a PHA selects MTW Test Rent #3, the MTW Plan must include the following:

- A description and justification of a PHA-proposed policy;
- An explanation of how the policy will: give households an incentive to increase their income, protect households that experience hardships, and reduce administrative burden on the PHA;
- An explanation of: how rents will be set initially and change over time, how alternative rent can benefit households; and how the policy will help households if they experience a hardship; and
- An explanation of why a PHA's policy is different from HUD's proposed options in MTW Test Rents #1 and #2 and why it would be better suited for the PHA.

## **Attachment 1**

### **Cross-Cutting Provisions**

Attachment 1 has six provisions that apply to each of the MTW Test Rent options.

#### Utility Allowances

The "rent" resulting from the alternative rent policy is the tenant's total contribution, including a utility allowance. If a public housing household has a tiered/stepped rent of \$300, they would pay their PHA an amount equal to \$300 minus their utility allowance. If an HCV household has a tiered/stepped rent of \$300, they would pay their landlord an amount equal to \$300 minus their utility allowance.

The alternative rent policies will include a utility allowance and must allow for utility reimbursements. That is, if a household has a utility allowance greater than their tiered/stepped rent, they will receive a utility reimbursement from their PHA. PHAs may use a simplified utility allowance. HUD encourages PHAs to adopt a simplified utility allowance tested by four existing MTW PHAs (Lexington, Louisville, San Antonio, and Washington, DC). PIH will provide more information on this simplified utility allowance after PHA selection.

#### Voucher Rents

HCV households cannot pay more than the actual gross rent for their unit. If an HCV household has a tiered/stepped rent of \$700, but they live in a unit with gross rent of only \$650, the household would pay the full \$650 and receive zero HUD subsidy. Even if the payment standard and FMR are higher (say, \$900) this household would receive zero HUD subsidy. If, however, such a household moved to a different unit with a gross rent of \$900 (and the FMR/payment standard allowed for this amount), their rent would be subsidized \$200.

If an HCV household rents a unit with gross rent above the payment standard, they are responsible for that incremental amount above the payment standard. This incremental amount would be added to their base tiered/stepped rent.

### Income Reexaminations

Regular income reexaminations will happen every three years. Reducing the frequency of reexaminations from annual to every three years will reduce PHA administrative burden and enable tenants to increase their income within the three-year period without a rent increase.

### Hardship Policy

MTW Test Rents #1 and #2 include a hardship policy. The hardship policy provides temporary rent relief, between one month and twelve months, that can be renewed. A PHA may determine the length of a hardship rent for each household, tailored to a household's circumstances. The purpose of a hardship policy is to provide a household with rent relief until they increase their income to the point where a hardship rent is no longer needed.

PHAs will have some additional discretion to offer hardships in situations when a household would not normally qualify but requires temporary rent relief to avoid eviction or other similar consequences. For example, if a household's income has not decreased but they face a major unanticipated medical bill, a PHA can determine an appropriate remedy.

### Moving to Another Unit

If a household moves in between regular three-year income reexaminations, its rent may change. For example, if an HCV household moves to a new unit, its rent will be recalculated based on the gross rent and payment standard corresponding to the new unit.

### Measuring Income

MTW Test Rents #1 and #2 will use a definition of income that differs from the existing rent rules. PHAs will not apply the income allowances or deductions typically used to calculate "adjusted income". Instead, income will be defined as total annual income (gross income).

Under existing rent rules income is defined as the amount that a household expects to receive in the next twelve months. This is sometimes referred to as "current/anticipated income". In MTW Test Rents #1 and #2 the three-year income reexaminations will measure gross income from the *prior year*. This should improve the accuracy of income reporting and better represent a household's long-term earnings potential.

Although alternative rents will use prior year gross income for three-year income reexaminations, when a tenant's income drops substantially (such as when they lose employment) their prior year gross income is no longer a good measure of their circumstances. Therefore, PHAs will continue to use current/anticipated income when reviewing hardship requests.

## MTW Test Rent #1: Tiered Rent (Income-Based)

### Income-Based Tiers

Households will be grouped by gross income into tiers. Within each tier rents are fixed. Any income increase within a tier does not affect a household's rent. Tiers are in \$2,500 increments. That is, the lowest tier includes households with gross income between \$0 and \$2,499; the next tier includes households with gross income between \$2,500 and \$4,999; and so on. The number of tiers would vary by PHA, with the maximum tier going up to a PHA's area median income.

Table 1 presents the minimum and maximum gross income for each tier up to \$32,499.

Tier	Tier Income minimum	Tier Income maximum	Tiered rent \$50
1	\$0	\$2,499	
2	\$2,500	\$4,999	\$94
3	\$5,000	\$7,499	\$156
4	\$7,500	\$9,999	\$219
5	\$10,000	\$12,499	\$281
6	\$12,500	\$14,999	\$344
7	\$15,000	\$17,499	\$406
8	\$17,500	\$19,999	\$469
9	\$20,000	\$22,499	\$531
10	\$22,500	\$24,999	\$594
11	\$25,000	\$27,499	\$656
12	\$27,500	\$29,999	\$719
13	\$30,000	\$32,499	\$781

### Minimum Rent

When a household begins participating in a tiered rent, they will be assigned to a tier based on their total annual gross income from the prior year. Within each tier, the rent is set to be affordable at the midpoint of the tier. Households in the lowest tier (with gross income less than or equal to \$2,499) will pay a minimum rent of \$50. For all other tiers, the rent is equal to the midpoint of the tier divided by 12 times 30%. All households in a tier have the same rent.

### Income Reexaminations Every Three Years

Each household's tiered rent will apply for three years. During that three-year period, their rent will not increase. After three years, each household will have an income reexamination and be placed in the tier that matches their total annual gross income from the prior year.



## Hardship Rents

Between three-year income reexaminations, a household's tiered rent will change if it is approved for a hardship rent. Hardships must be requested by a household. A household will receive a hardship if its total annual gross income – measured as *current/anticipated income* – drops into a lower tier than the tier they were assigned to in their three-year reexamination.

A hardship rent will be the tiered rent that corresponds to their new (lower) tier. This is expected to be temporary. A hardship rent will last between one and twelve months (at a PHA's discretion). A hardship rent may be renewed. If a hardship rent expires and a tenant does not request (or a PHA does not approve) a hardship renewal, then a household's rent will return to the tiered rent assigned at the most recent triennial income reexamination.

## **MTW Test Rent #2: Stepped Rent (Decoupled from Income)**

### Initial Rent

Each household will start paying rent equal to 30% of their total annual gross income from the prior year, or a minimum rent of \$50 (whichever is larger).

### Annual Stepped Rent Increase

A PHA will establish an annual stepped rent increase by unit size. After the first year each household's rent will increase annually by a specific dollar amount unrelated to each household's income. A PHA can set the stepped rent increase anywhere between 2% and 4% of the FMR. A PHA can choose whether to review and adjust a stepped rent increase each year, or leave it fixed for the 6-year study period of the MTW study.

The Notice provides a sample table:

Table 2: Sample FMRs and Minimum/Maximum Stepped Rent Increases

	Efficiency	1 bedroom	2 bedroom	3 bedroom	4 bedroom
Fair Market Rent	\$970	\$1,110	\$1,360	\$1,780	\$2,320
Minimum rent increase (2%)	\$19.40	\$22.20	\$27.20	\$35.60	\$46.40
Maximum rent increase (4%)	\$38.80	\$44.40	\$54.40	\$71.20	\$92.80

Using the sample from Table 2, the smallest rent increase that a PHA could choose would be equal to 2% of the FMR and the largest rent increase would be equal to 4% of the FMR. This PHA decides to set an annual stepped rent increase at \$20 for an efficiency unit, \$23 for a one-bedroom unit, \$28 for a two-bedroom unit, \$36 for a three-bedroom unit, and \$47 for a four-bedroom unit. After the first year, each household's rent would increase by the amount that corresponds to their unit size.

### Income Reexaminations Every Three Years

A PHA will conduct an income reexamination with each household every three years, using this three-year income reexamination to document income and household changes, and to confirm eligibility, but *not* to calculate a household's rent. The rent would continue to increase according to the stepped rent policy.

### Hardship Rents

Hardships must be requested by a household. Upon request, a PHA will conduct a hardship review and determine a household's *current/anticipated total annual income*. A household will be approved for a hardship if their rent exceeds 40% of their current/anticipated total annual gross income. A hardship rent will equal 30% of a household's current/anticipated total annual gross income.

PHAs will have some discretion to offer hardships when a household does not qualify based on the 40% rent burden criteria. For example, if a household is facing a significant increase in costs (e.g. a major medical bill), has a death in the family, or other similar circumstances, a PHA can decide to provide a household with temporary rent relief.

A hardship rent will last for one to twelve months (at a PHA's discretion) and can be renewed. When a hardship rent expires, if a household does not request (or a PHA does not approve) a hardship renewal, a household's rent will return to where it was before the hardship. Time spent in a hardship status will effectively pause stepped rent increases.

If a household spends 12 consecutive months in hardship status and at the end of that time the household requests an ongoing hardship rent, a PHA has two options. First, a PHA could continue to provide the household with temporary hardships as described above.

Alternatively, a PHA could reset a household's stepped rent. If a PHA resets a household's stepped rent, that would operate like an initial enrollment: a household's new rent would be based on 30% of their prior year gross income and would apply for a full year. At the end of that year, the household would resume the stepped rent increases. A PHA could approve a stepped rent reset even if a household does not have a rent burden above 40%.

**MTW Test Rent #3: PHA Proposed Alternative Tiered or Stepped Rent, *next page***

### **MTW Test Rent #3: PHA Proposed Alternative Tiered or Stepped Rent**

PHAs may propose a tiered or stepped rent that is different from the two other MTW Tests.

#### PHA-Alternative Tiered Rent Policy

If a PHA chooses to develop its own tiered rent policy, that policy must fit within the following boundaries:

*Overall Objectives:* The policy must be designed to achieve simplification and improved administrative efficiency. PHAs are also encouraged to use the policy to encourage resident self-sufficiency, to the extent practical.

*Tiers:* Tiers must be no smaller than \$2,000 and no larger than \$10,000. A PHA may set tiers of varying increments (e.g. tiers of \$2,500 up to a certain income level, and tiers of \$5,000 above that point).

*Rent-setting within Tiers:* A PHA may decide the rent households would pay within each tier. However, rents may not be set at a level that would result in more than 10% of affected households paying more than 40% of their income for rent.

*Other:* All other rent-related policy provisions not discussed above would be left to the discretion of a PHA, within the constraints of the MTW Operations Notice.

#### PHA- Alternative Stepped Rent Policy

If a PHA chooses to develop its own stepped rent policy, that policy must fit within the following boundaries:

*Overall Objectives:* A policy must be designed to give households an incentive to increase their earnings and move toward self-sufficiency. PHAs are also encouraged to use the policy to achieve simplification and improved administrative efficiency, to the extent practical.

*Year 1 Rent:* The rent that each household pays in the first year of the stepped rent schedule must have some relation to their ability to work toward self-sufficiency. Income at baseline is HUD's preferred proxy, but a PHA may propose an alternative method for determining year one rent. A PHA should *not* require all households to pay the same rent in year one.

*Income-Rent Connection:* After year one, rents must not increase based on a household's income. A PHA may use regular income reexaminations to reset rents and mitigate hardships, but only when a household's income is stagnant or decreasing.

*Stepped Rents:* A PHA may decide the form stepped rents take. A PHA could simply set an annual stepped rent increase (as under MTW Test Rent #2). A PHA could establish a stepped rent "schedule" as envisioned in the two stepped rent policies HUD presented in [Notice PIH-2019-04](#). Rents could increase less often than every year. However, the policy may not force a rent increase larger than 10% of the FMR in *any year*.

*Maximum Rent (Final Step):* A PHA may decide whether to set a maximum rent (the final step in the schedule) and at what level. A maximum rent should be appropriate for a PHA's housing market. In low-cost housing markets, it may be appropriate to have a maximum rent set at the FMR. In higher-cost housing markets, it may be more appropriate to have a stepped rent policy end in an ongoing shallow subsidy.

*Hardship Policy:* A PHA must have a hardship policy that provides rent relief to households who experience an involuntary loss of employment or income. HUD strongly recommends that a PHA also have some hardship provision for households who cannot increase their earnings enough to keep pace with scheduled stepped rent increases. A hardship policy must also attempt to prevent any household from being evicted as a result of a stepped rent policy. If a household cannot make their rent payments under a stepped rent policy, and other hardship provisions do not resolve their situation, a household should be returned to a Brooke rent for one year. After one year a PHA can reevaluate a household and may resume stepped rent.

*Other:* All other rent-related policy provisions not discussed above would be left to the discretion of a PHA, within the constraints of the MTW Operations Notice.

## **Links**

Notice PIH 2020-21 (Cohort #2) is at: <https://bit.ly/31cWcBL>

Main MTW website is at: <https://www.hud.gov/mtw>

MTW Expansion webpage is at: <https://bit.ly/39PEXdF>

The *Federal Register* version of the Operations Notice is at: <https://bit.ly/2ECV569>

An easier to read version of the Operations Notice is at: <https://bit.ly/3hCrqZf>

More about MTW is on [page 4-57](#) of NLIHC's *2020 Advocates' Guide*.

More information about public housing is on [page 4-30](#) of NLIHC's *2020 Advocates' Guide*.

More information about Housing Choice Vouchers is on [page 4-1](#) of NLIHC's *2020 Advocates' Guide*.

More information about the Annual PHA Plan is on [page 7-61](#) of NLIHC's *2020 Advocates' Guide*.