



Request for Information

Regarding Project Based Vouchers for Veterans

Feb 8, 2022

Providence Housing Authority (PHA) and the VA Providence Healthcare System are considering conducting a request for proposals for project-based vouchers, specifically for the Housing and Urban Development-Veterans Administration Supportive Housing (HUD-VASH) vouchers.

We are requesting information from potentially interested parties about existing, in-process housing construction or rehabilitation projects, or proposed housing developments where there is potential for project basing HUD-VASH vouchers.

Note that many participants in the HUD-VASH program have physical disabilities so PHA and VA are particularly interested in accessible units, including fully ADA Accessible units, ground floor units, and units in multi-floor buildings with elevators.

Housing owners, developers, property managers or service providers may submit responses to this RFI. No award will be made based on responses to this RFI. **Responders are encouraged to provide as complete a response as possible** (addressing all applicable questions related to existing or proposed projects) **to help inform the PHA and VA's awareness of potential community interest and capacity for serving HUD-VASH clients through PBVs.**

At this time the PHA and VA anticipate that a total of no more than 25 VASH PBVs will be available in a potential 2022 RFP but are not committing that this full number will be made available. PHA and VA are unlikely to consider submissions requesting less than 5 PBVs in a given development. **A future RFP may be released in 2022 after the PHA and VA review responses to this RFI and determine what number of vouchers can be made available.**

Please submit responses via email to Lydia McCoy, PHA Office of Strategy and Development, at lmccoy@provhousing.org no later than **Friday, March 18th at 3:00pm**. Questions on the RFI may be submitted to the same email address.

Respondents are encouraged to review the background information regarding the HUD-VASH program and project based voucher rules in this document to help inform your response and better understand what information may be included in a future RFP.

Information requested:

- 1) Role of respondent (owner/partner, developer, property manager, services partner)
- 2) Name and location of development
- 3) Whether development is existing housing, under construction, or proposed housing
- 4) Experience of owner and/or property manager in working with the HUD-VASH, housing choice vouchers, project based vouchers, or other subsidized housing programs.
- 5) Experience of owner or property manager in providing supportive services to veterans, particularly veterans who have experienced homelessness, and/or similar populations.
- 6) Description of the property – respondents are asked to limit any submission of drawings, renderings or photographs to no more than 10 pages. Please include any available information on the accessibility of potential PBV units.
- 7) Support services in place or planned for HUD-VASH clients in development
- 8) Potential number of HUD-VASH PBV units (applicants will not be required to keep to this number in a subsequent application – but it is to just give PHA and VA a sense of the scale of potential opportunities).

As explained in the background section below, for new housing or housing undergoing substantial redevelopment, a commitment to provide PBVs before construction for more than 8 units will require Davis-Bacon wages be paid for all construction of the development.

- 9) Please include expected bedroom size of units that would be proposed for project basing, and how many of these units would be handicap-

accessible. Note that most HUD-VASH voucher holders qualify for one bedroom vouchers.

FOR EXISTING HOUSING ONLY:

- 10) Are any units in the development currently occupied by HUD-VASH voucher holders or other veterans?

- 11) If the units are occupied or anticipated to be occupied at the time of PBV award (approximately fall of 2022) will the owner have access to alternative housing to offer existing tenants in accordance with the Uniform Relocation Act?

BACKGROUND FOR RESPONDENTS

Background on the HUD-VASH Program

The Veteran's Affairs Supportive Housing (HUD-VASH) Program is a joint effort between the Department of Housing and Urban Development (HUD) and the Veterans Administration (VA). HUD-VASH vouchers are allocated to housing authorities, like the PHA, for veterans with disabling conditions who are experiencing homelessness to live in market rate rental units. The HUD-VASH team provides community-based comprehensive case management services that support the Veteran's transition into his/her housing unit and provides access to needed health resources. The PHA has received an allotment of HUD-VASH vouchers annually since 2008 and currently administers 219 of them, of which 31 are project-based.

To learn more about the HUD-VASH program, visit the [VA's website](#).

To apply for a HUD-VASH unit, veterans must contact the VA for eligibility criteria and application process. The VA determines eligibility for the program and the type of unit received.

The PHA currently provides project-based assistance for veterans through the HUD-VASH program at the following locations:

- Veteran's for Tomorrow (20 units) – 115 Douglas Ave. Providence, RI 02904
- Sgt. Belanger Housing (11 units) – 963 Chalkstone Ave. Providence, RI 02908

Background on the PBV program

The Providence Housing Authority ("PHA" or the "Authority") was established in 1939, for the purpose of engaging in the development, acquisition and administrative activities of the Low-Income Housing Program and other programs with similar objectives. The United States Department of Housing and Urban Development ("HUD") has direct responsibility for administering LIPH under the United States Housing Act of 1937, as amended. HUD is authorized to enter into contracts with local housing authorities to make grants to assist the local housing authorities in financing the acquisition, construction and/or leasing of housing units and to make annual contributions (subsidies) to the local housing authorities for the purpose of maintaining the low rent character of the local housing program.

The Providence Housing Authority is the largest housing authority in the state of Rhode Island. A quasi-governmental organization with over 80 years of experience, the Providence Housing Authority is committed to developing and maintaining decent, safe and sanitary housing to address the economic and social needs of Providence residents.

The Authority currently owns and manages over 2,600 units of low income public housing. The PHA also administers over 2,700 vouchers under the Housing Choice Voucher Program, also known as the Section 8 program.

Section 8 Project-Based Voucher Assistance

The project-based voucher (PBV) program allows a Public Housing Authority that already administers a housing choice voucher program under an annual contributions contract (ACC) with the Department of Housing and Urban Development (HUD) to allocate up to 30 percent of its authorized number of vouchers covered through the ACC and attach the subsidy to specific units of

housing rather than using it for tenant-based assistance [24 CFR 983.6]. Under the PBV program, a housing authority enters into a Housing Assistance Payments ("HAP") Contract with a property owner to pay rental subsidy on behalf of eligible tenants (defined as households earning 50% of Area Median Income or lower). The subsidy is subject to all applicable HUD regulations. The HAP contract may cover either all or a portion of the units in a development.

The PHA may attach PBV assistance for units in existing housing or for newly constructed or rehabilitated housing developed under and in accordance with an agreement to enter into a Housing Assistance Payments (HAP) Contract that was executed prior to the start of construction. A housing unit is considered an existing unit for purposes of the PBV program, if, at the time of notice of PHA selection, the units substantially comply with HQS. Units for which new construction or rehabilitation began after the owner's proposal submission but prior to the execution of the HAP do not subsequently qualify as existing housing [24 CFR 983.52].

Much of the tenant-based voucher program regulations also apply to the PBV program. Consequently, many of the PHA policies related to tenant-based assistance also apply to PBV assistance. The provisions of the tenant-based voucher regulations that do not apply to the PBV program are listed at 24 CFR 983.2. Partners with units selected under this RFP will be required to follow the PHA's Approved Administrative Plan policies for all units under the HAP Contract.

PBV Limitations and Exceptions

In general, the PHA may not select a proposal to provide PBV assistance for units in a project or enter into an Agreement to Enter into a HAP (also known as an AHAP) or a HAP contract to provide PBV assistance for units in a project, if the total number of dwelling units in the project that will receive PBV assistance during the term of the PBV HAP contract is more than the greater of 25 units or 25 percent of the number of dwelling units (assisted or unassisted) in the project. [24 CFR 983.56]

Exceptions are allowed and PBV units are not counted against the 25 percent or 25-unit per project cap if [PIH Notice 2017-21]:

- The units are exclusively for elderly families
- The units are for households eligible for supportive services available to all families receiving PBV assistance in the project

- The project is located in a census tract with a poverty rate of 20 percent or less, as determined in the most recent American Community Survey Five-Year estimates
 - For these projects, the project cap is the greater of 25 units or 40 percent (instead of 25 percent) of the units in the project [.

General Guidelines

The Providence Housing Authority will award Section 8 Project-Based Vouchers to eligible applicants based on the guidelines listed below.

To determine eligibility for the program, please carefully read the following information. There will be no exceptions or waivers granted.

Eligible and Ineligible Properties

- Newly constructed and existing structures of various types may be appropriate for attaching assistance to the units, including single-family and multi-family structures.
- A housing authority may not attach assistance to units in the following types of housing (24 CFR 983.53):
 - ✓ Housing for which the new construction is started before an Agreement to Enter into Housing Assistance Payments is executed;
 - ✓ Housing for which the rehabilitation is started before an Agreement to Enter into Housing Assistance Payments is executed;
 - ✓ Shared housing; nursing homes; and facilities providing continual psychiatric, medical, nursing services, board and care or intermediate care;
 - ✓ Units within the grounds of penal, reformatory, medical, mental and similar public or private institutions;
 - ✓ Units that are owned or controlled by an educational institution or its affiliate and are designated for occupancy by students of the institution;
 - ✓ Manufactured homes;
 - ✓ Transitional housing; and
 - ✓ Units occupied by ineligible families.

- Assistance may not be attached to a unit that is occupied by an owner.

- In no event may any occupant of a unit with project-based assistance receive the benefit of any of the following (24 CFR 983.54):
 - ✓ Any other form of Section 8 assistance
 - ✓ Rent supplement
 - ✓ Section 23 housing assistance
 - ✓ Section 236 "deep subsidy" rental assistance payments.

In addition, the PHA may not enter into a HAP contract for any project unless it meets the HUD required Site and Neighborhood Standards for existing and rehabilitated housing (24 CFR 983.57[d]) or for new construction (24 CFR 983.57[e]), depending on which standards apply to the project.

Construction and Rehabilitation

If an Agreement covers the development of nine or more contract units (whether or not completed in stages), the owner and the owner's contractors and subcontractors must pay Davis-Bacon wages to laborers and mechanics employed in the development of housing. The HUD-prescribed form of the Agreement will include the labor standards clauses required by HUD, such as those involving Davis-Bacon wage rates [24 CFR 983.154(b)]. This requirement applies to both new construction and substantial rehabilitation and is based on the number of project based voucher units, not the total development size.

The owner, contractors, and subcontractors must also comply with the Contract Work Hours and Safety Standards Act, Department of Labor regulations in 29 CFR part 5, and other applicable federal labor relations laws and regulations. The PHA must monitor compliance with labor standards.

Broadband: For newly constructed or substantially rehabilitated buildings with more than four rental units (regardless of the number of PBV units) must include installation of broadband infrastructure, as this term is also defined in 24 CFR 5.100, except where the owner determines and documents the determination that:

- (a) The location of the new construction or substantial rehabilitation makes installation of broadband infrastructure infeasible;

(b) The cost of installing broadband infrastructure would result in a fundamental alteration in the nature of its program or activity or in an undue financial burden; or

(c) The structure of the housing to be substantially rehabilitated makes installation of broadband infrastructure infeasible.

Equal opportunity Hiring: The owner must comply with federal equal employment opportunity requirements of Executive Orders 11246 as amended (3 CFR, 1964-1965 Comp., p. 339), 11625 (3 CFR, 1971-1975 Comp., p. 616), 12432 (3 CFR, 1983 Comp., p. 198) and 12138 (3 CFR, 1977 Comp., p. 393).

Environmental Review and Unit Inspections

The owner must be willing to allow the PHA to perform a Housing Quality Standards (HQS) or UPCS-V inspection on assisted units. Once proposed units have passed the inspection, the PHA will move forward towards the execution of a HAP Contract.

PHA activities under the PBV program are subject to HUD environmental regulations in 24 CFR parts 50 and 58. The Responsible Entity (RE) is responsible for performing the federal environmental review under the National Environmental Policy Act of 1969 (42 U.S.C. 4321 et seq.). The PHA may not enter into an Agreement to Enter into a HAP contract nor enter into a HAP contract until it has complied with the environmental review requirements. For new construction projects, a subsidy layering review will also need to be performed.

Handicap Accessibility

Housing must comply with accessibility requirements of Section 504 of the Rehabilitation Act of 1973 (29 U.S.C. 794) and implementing regulations at 24 CFR part 8 [24 CFR 983.102]. The PHA commits to making accessible units available in a sufficient range of sizes and amenities.

HUD's Section 504 regulations define an accessible dwelling unit as a unit that is located on an accessible route and can be approached, entered, and used by individuals with physical disabilities. A unit that is on an accessible route and is adaptable and otherwise in compliance with the standards set forth in 24 C.F.R. 8.32 is accessible. In addition, the Section 504 regulations impose specific

accessibility requirements for new construction and alteration of housing and non-housing facilities in HUD assisted programs. Section 8.32 of the regulations states that compliance with the appropriate technical criteria in the [Uniform Federal Accessibility Standards](#) (UFAS) or [HUD's Deeming Notice](#), or a standard that is equivalent to or stricter than the UFAS, is an acceptable means of meeting the technical accessibility requirements in Sections 8.21, 8.22, 8.23 and 8.25 of the Section 504 regulations. However, most units are covered by multiple federal accessibility laws and multiple federal accessibility standards. Compliance with all applicable accessibility laws is necessary.

Displacement and Relocation

Any persons displaced as a result of implementation of the PBV program must be provided relocation assistance in accordance with the requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA)[42 U.S.C. 4201-4655] and implementing regulations at 49 CFR part 24.

Tenant Selection and Wait List

Applicants who will occupy units with PBV assistance must be selected through referrals from the VA Providence Healthcare System, and program/income eligibility determined by the PHA. Owners would determine suitability of housing for those referred and would have the responsibility for conducting any screening they deem appropriate. PHA anticipates that any future PBV RFP will require PBV applicants to submit an existing or proposed tenant selection plan to ensure that potential partners share the PHA and VA's interest in providing housing for hard to house populations.

Defining Supportive Services

The PHA may consider exceptions to the per-project unit cap for projects that offer Supportive Services to all residents. In addition, points will be given under this RFP for developments offering Supportive Services based on the quality and level of services being offered, the alignment of those services to the needs of the population being served, and the experience of the owner, management company or partner providing the services.

For HUD-VASH vouchers in particular, PHA and VA will be looking for proposals from agencies with services that are geared towards the needs of the HUD-VASH voucher population.

The PHA considers following types of services as supportive services:

- Developments offering Comprehensive Life Skill Training and Support such as Housekeeping/homemaking, nutrition, budgeting, parenting skills, active case management, referrals to local community agencies that offer additional services need by the participating resident/household.
- Developments that offer Care to Elderly and/or Disabled Individuals such as mental health services and/or case management along with supervised taking of medications and transportation.
- Developments that offer On-Site Treatment and Case Management for Drug and/or Alcohol Rehabilitation for current abusers
- Developments that offer Educational and Job Training Opportunities such as on-site childcare, GED or ESL classes, assistance with obtaining citizenship or citizenship classes, computer classes/training, work skills development and job training, college level or similar classes.
- Developments that offer Self-Sufficiency and Homeownership Programs to their residents.

For each of the above, services and trainings must be provided by the development or by a partner with a signed Memorandum of Understanding.

Terms and Conditions

Through the PBV program, the PHA will enter into a Housing Assistance Payments (HAP) Contract with select property owner(s) for an initial term of no less than one year and no more than 20 years. The term of all PBV HAP contracts will be negotiated with the owner on a case-by-case basis. Any time before expiration of the HAP contract, the PHA may extend the term of the contract for an additional term of up to 20 years if the PHA determines an extension is appropriate and sufficient funding is available.

For each unit type and size, the proposed contract rent must be provided as well as a breakdown of the utilities to be paid by the tenant and by the owner.

The rent requested plus utility allowances for any utilities paid by tenants must not exceed the lower of:

- 110% of the HUD Published Fair Market Rents (FMR) for the Providence-Fall River-New Bedford Metro Area; or

- The reasonable rent (set by the PHA) developed by comparing the units to similar unassisted housing in the community.