

**Montana Department of Commerce
Tenant Based Section 8 Program
Comments to 2017 Administrative Plan**

MDOC would like to thank those that provided comments to the 2017 Administrative Plan as well as the two concept papers on homeless preference and project-based vouchers. Below are the comments that were received and MDOC's responses.

CHAPTER 2 – Voucher Term

MDOC PHA Policy

The initial voucher term will be 60 calendar days. The family must submit a Request for Tenancy Approval and proposed lease within the 60-day period unless MDOC grants an extension.

Comment

District 7 Billings

Voucher holders should be given 90 days to find a place due to tight rental market and high rents.

MDOC Response

MDOC's administrative plan allows for extensions of 30 days at a time if special circumstances make it difficult to find a suitable unit.

CHAPTER 2 – Extensions of Voucher Term

MDOC PHA Policy

Voucher holders are required to provide the local field agent with a request for lease approval, or request an extension of the voucher term in writing, prior to expiration of the initial voucher term. If approved, extensions will be granted for 30 days at a time.

Comments

District XI Missoula

We support approval of extensions for 30 day intervals. Suggest that applicants should be notified in writing by MDOC as to whether the request for extension was granted. Field agents could be copied on the letter. Create a handout that explains extensions that is in HAPPY and can be mailed when people want information on them.

MDOC Response

MDOC agrees that written notification should be sent out when extensions are granted. MDOC is currently working on revamping all of the notices that are available in HAPPY (MDOC's database) to eliminate duplication, provide better clarity and information, etc. MDOC is also

working toward a process that would allow field agencies to send out notifications. MDOC will continue to work toward finalizing these processes in the next few months and provide training to field agency staff once this is complete.

Bozeman HRDC

We recommend that MDOC pick a certain amount of days for extensions to provide consistency. Field agents need to be able to inform clients of what they can expect.

MDOC Response

MDOC has identified in the plan that extensions will be granted for 30 days at a time.

MDOC PHA Policy

... Following is a list of extenuating circumstances that the PHA may consider in making its decision...

- Whether family size or other special circumstances make it difficult to find a suitable unit

Comment

Montana Legal Services Association (MLSA)

Add following statement to above PHA Policy (in bold):

- *Whether family size or other special circumstances, **such as the limited availability or rentals in the locale**, make it difficult to find a suitable unit*

In some places, like Bozeman, the vacancy rate is so low that it's hard for anyone to find a rental, but especially HCV participants. It's a good idea for MDOC's Admin Plan to specifically reference that as a consideration.

MDOC Response

MDOC concurs with this comment and will add this to the above referenced statement in the Admin Plan.

CHAPTER 3 – Family and Household

Comment

District XI Missoula

Throughout the Admin plan the words MDOC and PHA are used interchangeably. This is confusing, particularly on page 10, Chapter 3, Household Composition. It would be helpful to either use PHA or use MDOC. Also, in general a glossary of terms with definitions might be helpful for those who are new to the program and/or the general public.

MDOC Response

MDOC agrees that the use of the two terminologies is confusing. MDOC will eliminate references to PHA and use MDOC in its place as appropriate within the administrative plan.

MDOC has recently developed a Reference Manual that is available on MDOC's website. This manual is an A to Z document that provides a list of commonly used acronyms, definitions, links to regulations, MDOC Admin plan, HUD notices, etc.

CHAPTER 4 – ASSETS – Passbook Savings Rate

MDOC PHA Policy

MDOC will establish its own passbook savings rate and review it annually to determine if it is within the safe harbor range (75 basis points, plus or minus, of the Savings National Rate).

Comments

District XI Missoula

Might be clearest to just use the federal rate.

MDOC Response

HUD's PIH Notice 2012-29 requires that the passbook rate must be established within the Savings National Rate which is a simple average of rates by US depository institutions as calculated by the Federal Deposit Insurance Corporation (FDIC). The FDIC publishes the rate on a weekly basis.

Bozeman HRDC

We would encourage MDOC to specify when they will be updating passbook rate in HAPPY.

MDOC Response

MDOC will notify field agencies of the passbook rate update in HAPPY during the June 2017 monthly TBS8 meeting held with field agencies.

CHAPTER 4 – Medical Expenses

MDOC PHA Policy

MDOC will use IRS Publication 502, Medical and Dental Expenses, for determining allowable medical expenses.

Comments

Montana Legal Services Association (MLSA)

*HUD allows participants to deduct the costs of upkeep of assistance animals. (See Handbook 4350.3, which applies to project-based Section 8 programs, p. 5-49, which says that eligible medical expenses include "Live-in or periodic medical assistance such as nursing services, or costs for an assistance animal and its upkeep" – there is no reason why tenant-based assistance should have medical deductions different from project-based assistance. IRS limits assistance animal related deductions to persons with physical disabilities. Propose MDOC add to policy the following: **For participants with disabilities who have assistance animals, MDOC will allow deductions for the expenses for an assistance animal and the animal's upkeep, whether the participant's disability is physical or mental/emotional.***

MDOC Response

MDOC concurs that the IRS Publication 502 doesn't address expenses as they relate to assistance animals.

MDOC will add the following language to the Administrative Plan: MDOC will also allow, as medical expenses, the costs for food, grooming and veterinary care of assistance animals.

District XI Missoula

When referring to the IRS publication 502, provide the actual link to the publication.

MDOC Response

MDOC will update and/or add links in the Administrative Plan as part of the finalizing process before submitting document to HUD.

Bozeman HRDC

Our agency has reviewed IRS Publication 502, we feel this will need further training to operationalize, with an established phase in period.

MDOC Response

This policy will go into effect on July 1, 2017. MDOC will reach out to the field agencies to gather additional information as to the specific training needs agencies have regarding this subject.

CHAPTER 4 - Income

MDOC PHA Policy

MDOC is considering adopting the streamlining rule regarding obtaining third-party documentation for fixed sources of income every three years.

Below is a list of items that need to be taken into consideration for adoption of rule:

- Only applied to program participants, not applicants in initial year of being admitted to program
- MDOC must identify all the sources of income that will be considered eligible for a streamlined income determination
- Must have source documentation from previous year, otherwise can't apply streamlined rule
- Must apply a **verified** cost of living adjustment (COLA) that is obtained from either a public source or from tenant-provided, third-party generated documentation. If COLA information is not available, PHA must obtain third-party verification of income amounts and streamlined rule would not be utilized.
- All other income and allowances must still be verified through third-party documentation

Comments

District 7 Billings

When an elderly person is added to the household, that income should be permanently excluded. Families are finding themselves having to add elderly members into their household because they need assistance in caring for oneself but not ready for a nursing home. The additional income the person receives is being added to the household income which increases the family's portion of rent. Given the increasing number of elderly in Montana, this situation is going to occur more often.

MDOC Response

HUD regulations do not permit MDOC to establish policies or procedures regarding what type of income should or should not be counted in determining a family's portion of rent. MDOC follows the HUD regulatory requirements for what income to count as stated in the code of federal regulations at 24 CFR 5.609 and 24 CFR 982.516(b)(1).

Montana Legal Services Association (MLSA)

MLSA supports MDOC's proposed change to streamline the rule regarding third-party documentation for fixed sources of income every three years instead of every year, as long as MDOC applies the actual COLA that applies to the source of income and doesn't impose an estimated COLA that the participant doesn't actually receive.

MDOC Response

The streamlining rule, if adopted, requires that the COLA be verified. If MDOC or a field agency is unsuccessful in verifying the COLA, then the rule requires that third-party documentation be obtained.

District 7 Billings

Social Security income exclusion – for households depending only on Social Security, exempt the first \$1,000 per month. People living on \$733/month and pay \$250 for rent doesn't leave much.

MDOC Response

HUD regulations do not permit MDOC to establish policies or procedures regarding what type of income should or should not be counted.

District 7 Billings

Drop the tenant portion to 25%. Can't afford to buy a car.

MDOC Response

HUD regulations do not permit MDOC to redefine the percentage of income used to calculate the tenant's portion of rent.

District XI Missoula

Supportive of change to verification every three years for fixed income. Also, in cases where Social Security is the income source after initial documentation is provided and established in EIV, do not require the letter again in three years. Use EIV instead of the letter.

MDOC Response

Pursuant to HUD's PIH Notice 2010-19, PHAs are mandated to use the EIV system for obtaining Social Security income information. PHAs are not required to obtain or request a benefit verification letter from the tenant unless the tenant doesn't agree with the EIV reported benefit information or is a new participant of the Housing Choice Voucher Program.

Bozeman HRDC

Streamlining rule may not be necessary as EIV quickly verifies fixed income. All other documents must be updated annually which verifies COLA adjustment. New rules may not provide greater efficiencies.

MDOC Response

Based on the comments received, MDOC has decided not to adopt the streamlining rule for fixed income.

District XI Missoula

Clarify what federal rule will be used for dictating how many pay stubs are required.

MDOC Response

HUD's PIH Notice 2010-19 – Administrative Guidance for Effective and Mandated Use of the EIV System, states that at a minimum two current and consecutive pay stubs for determining annual income is required. An original or authentic document generated by a third party source must be dated either within the 60-day period preceding the reexamination OR the PHA request date.

District XI Missoula

Are there other state generated documents that could be used for documenting income? For example, TANF out of CHIMES.

MDOC Response

Field agencies may utilize any third party source generated from a computerized system that provides the information necessary to calculate annual income.

District XI Missoula

Move to a 2-year recertification for SSI, SSDI and retirement benefits. Don't require submission annually of recertification materials for individuals receiving these monthly benefits

MDOC Response

HUD regulations at 24 CFR 982.516(a) require that a PHA must conduct a reexamination of family income and composition at least annually.

District XI Missoula

Payment determinations need to be mailed out to clients sooner so they know what portion of rent they are required to pay in advance of the rent being due.

MDOC Response

MDOC is currently working toward allowing field agencies more flexibility in providing this type of information to the clients directly as well as encouraging agencies to begin the annual reexamination process at least 120 days in advance of the due date. This should allow for more timely notifications being sent out to clients.

MDOC CHAPTER 9 – Disapproval of Owners in the HCV Program

MDOC PHA Policy

MDOC does not have a policy that addresses renting from relatives. MDOC follows HUD regulatory requirements.

Comments

District 7 Billings

Renting from relatives. Given the increasing difficulty that young people have buying a house, renting from relatives would be a great option. Perhaps parents would be willing to buy a second home to rent to their kids thus helping the economy as well as helping their kids.

MDOC Comment

24 CFR 982.306(d) states that a PHA must not approve a unit if the owner is the parent, child, grandparent, grandchild, sister, or brother of any member of the family. HUD regulations do allow a participant to rent from a relative if the approval provides a reasonable accommodation for a family member who is a person with disabilities.

MDOC CHAPTER 11 – Absent Family

MDOC PHA Policy

Absence means that no member of the family is residing in the unit.

Comments

District XI Missoula

This sentence “Absence means that no member of the family is residing in the unit” is confusing. We think this sentence needs to be corrected and that it might be intended to say something different.

It’s hard to know if this section refers to the entire family or a family member being absent. In general, spell out what happens when whole family is gone from the unit versus what happens when a member is gone from the unit.

MDOC Comment

The language used in this section has been extracted from HUD’s regulation and specifically applies to the entire family being absent.

CAP-NWMT Kalispell

Reinstate the mandate that individuals missing from a household for more than 180 days need to be removed from the household. We have quite a few folks up here that are currently incarcerated (one is being held for murder) and they are currently receiving Section 8 subsidy. By removing folks that are absent from the household, we are able to reduce payment standards to their appropriate size, saving the state thousands of dollars annually.

MDOC Comment

There are numerous reasons as to why a family member can be absent from the unit which could have a negative effect on the family if MDOC institutes this stricter standard. For example, children who have been temporarily removed from the household but not permanently removed through a court order would not have a place to come back to once the temporary order is lifted. Likewise, households could have members in the armed forces that are deployed for longer periods than 180 days that need a home to come back to when the deployment ends.

Adjustments to payment standards due to family composition changes are not allowed by regulation to be imposed until the annual reexamination. Family composition is required to be reviewed at all annual reexaminations pursuant to 24 CFR 982.516(a).

Montana Legal Services Association (MLSA)

MSLA proposes that the word “will” be changed to “may” in the following policy (in bold) with additional language added:

*If the family fails to contact the contracted field agency and/or MDOC that they are going to be absent for more than 30 days, assistance **may** be terminated for the family pursuant to 24 CFR 982.552, and the family retains the right to appeal the termination.*

MDOC Response

MDOC will change the language in the above referenced statement to state “may”.

*If the family is absent from the unit for more than 180 consecutive calendar days **without approval from MDOC**, the family’s assistance **may** be terminated pursuant to 24 CFR 982.552, and the family retains the right to appeal the terminations.*

MDOC Response

HUD regulations at 24 CFR 982.312(a) & (b) state that a family may not be absent from the unit for a period of more than 180 consecutive calendar days in any circumstance or for any reason and requires that assistance be terminated if the family is absent for longer than the maximum period permitted.

MLSA comments that there may be a compelling reason why the family has been absent. For example, if the family is absent so that a member can get treatment for cancer or other health condition in another state, the family should have the option of keeping their Section 8 home in MT to return to.

MDOC Response

MDOC administrative plan does provide families the opportunity to be absent from the unit longer than 30 days but only upon proper notification to MDOC and/or the field agency and subsequent approval. HUD regulations, however, require termination of assistance for a family absence lasting longer than 180 days which MDOC is required to comply with.

CHAPTER 13 – Informal Reviews for Applicants

MDOC PHA Policy

MDOC will not offer an informal review to applicants for any of the following:

- Discretionary administrative determinations by MDOC

Comments

Montana Legal Services Association (MLSA)

Discretionary administrative determinations by MDOC should be removed from this list of events which are excluded from informal review. An applicant should be able to appeal discretionary decisions by MDOC, to give the applicant the chance to fully explain the circumstances upon which MDOC's decision is based. For instance, MDOC's decision to deny admission to a felon is discretionary. Let's say MDOC denies Fred Felon's application. This rule currently would prohibit Fred from requesting an information review. MLSA proposes that Fred be allowed an information review to give Fred the opportunity to provide more information related to the circumstances of the crime – perhaps he had an untreated mental illness at the time and now he's on medication or perhaps he successfully completed an intense rehabilitation program.

MDOC Response

HUD regulations at 24 CFR 982.554(c) state that an informal review is not required for discretionary administrative determinations made by the PHA. MDOC will continue to comply with this regulatory allowance.

CHAPTER 14 – Informal Hearings for Participants

MDOC PHA Policy

The family will be allowed to copy any documents related to the hearing at a cost of \$.25 per page. The family must request discovery of MDOC's documents no later than 10 days prior to the scheduled hearing date.

MDOC must be given an opportunity before the hearing to examine any family documents that are directly relevant to the hearing at the Helena, Montana office. Whenever a participant requests an informal hearing, MDOC will automatically mail a letter to the participant requesting a copy of all documents that the participant intends to present or utilize at the hearing. Both parties must make the documents available no later than 10 days prior to the scheduled hearing date. If the document(s) are not made available for examination, neither party may rely on the document(s) at the hearing.

Comment

Montana Legal Services Association (MLSA)

Ten days is too long. It is unrealistic to expect a participant who is unrepresented to provide documents to MDOC so far in advance of the hearing, or to request documents from MDOC so far in advance. Also, if the participant contacts an attorney for help at the informal hearing, that contact to the attorney may not happen in time for the attorney to meet the 10-day deadline. Since the rule states that MDOC will be automatically requesting documents from the participant in every informal hearing, then the same should be true for participants -- it's best if MDOC automatically sends the participant the documents upon which MDOC has based its decision after the participant has requested an appeal, without waiting for the participant to request copies of the MDOC documents. MDOC should not charge the participant for copies of the documents – note that in the current rule, only the participant has to pay for copies, MDOC doesn't have to pay the participant for copies of the documents upon which the participant will be relying. MLSA proposes that this section be re-written to say something like this:

After the participant requests the informal hearing, MDOC will send the participant copies of all documents that are directly relevant to the hearing that MDOC intends to present or use at the hearing. In MDOC's letter to the participant enclosing the documents, MDOC will inform the participant that s/he must provide MDOC with copies of the documents the participant intends to use at the hearing by the day before the hearing, at the latest. The letter will also state that if the participant cannot afford to copy the documents for MDOC, the participant can take them to the MDOC field agent (which will be identified in the MDOC letter) for copying and sending to MDOC.

MDOC Response

MDOC feels that the 10 day timeframe allows time for both sides to review documentation and prepare responses for use in the hearing. However, MDOC will add language to the Administrative Plan that will allow for an extension of the 10 day timeframe, if both parties agree to the extension.

MDOC PHA Policy

MDOC will reimburse the requesting participant for only the participant's mileage or transportation expenses (at applicable state rates for state employees) to and from the hearing location. All other costs incurred by the participant requesting the hearing, such as lodging, meals, legal representation, are to be borne by the requesting participant.

Montana Legal Services Association (MLSA)

A participant's right to appeal should not be conditioned on being able to pay the travel costs related to the appeal. Even if MDOC reimburses the participant for mileage, the participant would still have to come up with the money to pay for gas up front. This is a barrier to the participant's appeal rights. A participant should be allowed to appear by phone, if s/he so chooses. MLSA proposes this addition to this section:

MDOC shall inform the participant that s/he and her/his witnesses may choose to appear at the hearing by phone, rather than in person. If the participant chooses to appear by phone, MDOC shall find out from the participant what phone number to call for the participant at the time of the hearing, and what phone number to call for the witness(es), and shall inform the participant that s/he may choose to use a phone for free at the office of the MDOC field agent.

MDOC Response

MDOC already provides an option for a participant to attend a hearing by other means. MDOC will add specific language to the Administrative Plan that stipulates other options are available and attendance in person is not required to participate in an informal hearing.

Montana Legal Services Association (MLSA)

MLSA proposes adding text to the Admin Plan regarding Informal Hearings to make clear that HAP payments to the landlord will continue during the informal hearing process as stated in HUD's HCV Program Guidebook, page 15-4 which says "The PHA must make housing assistance payments to the owner as long as the tenant remains a program participant and remains in the unit, even if the owner has started the eviction process. The PHA must continue to pay the housing assistance payment to the owner until the family moves or the court judgment allows the owner to evict."

*Proposed text to add: **HAP Payments to Continue While Appeal is Pending, in Tenant-Based HCV program and in Mod Rehab program:***

MDOC will not stop making HAP payments to a landlord upon receiving notice that the landlord is terminating the participant's lease. If MDOC proposes to terminate the participant's housing assistance based upon the landlord's notice, then MDOC will send the participant a written notice of termination. If the participant requests an informal hearing, HAP payments will continue to the landlord until the date that the appeal is finally resolved by MDOC's administrative procedure.

If the landlord files a court action for possession against the participant and the participant prevails in the court action, MDOC will not terminate the participant's housing assistance. The HAP payments to the landlord during the pendency of the court action.

MDOC Response

MDOC does follow regulatory and HAP contract requirements by continuing to pay the HAP (Section 7 of HAP contract) until such time as the owner notifies MDOC that he/she may now evict the family pursuant to a court order or that the family has already vacated the unit. Additionally, the HAP contract also requires that once the lease has been terminated, the HAP contract terminates (Section 4b(1)).

This administrative plan doesn't apply to Mod Rehab which is governed under 24 CFR §882. Issues regarding that program will be addressed separately by MDOC through the appropriate venue.

The proposed language suggested by MLSA seems to be dealing with actions taken by a landlord/owner rather than actions that could be taken by a PHA. Only actions taken against a participant by a PHA fall under the informal hearing process. A PHA is not a party to any action that a landlord/owner can take against a participant and doesn't fall under HUD regulations.

CHAPTER 15 – Payment Standards

MDOC PHA Policy

MDOC will review the appropriateness of the payment standards on an annual basis when the new FMR is published and at other times as determined necessary.

Comment

District 7 Billings

Payment standard is too low for Big Horn County. Can't find anything but dumpy trailers.

MDOC Response

MDOC has set the payment standards at the maximum level permitted by HUD regulation which is 110% of fair market rent.

CHAPTER 19 – Interim Reexaminations

MDOC PHA Policy

Families are required to report all changes of income/asset and change in family composition in writing within thirty (30) days of the change using the required MDOC Income and Family Certification Form.

Comment

District XI Missoula

In cases where change in income doesn't change the HAP – for example an income up (except when starting at zero income), don't require it be reported at all until recertification. It's required now but nothing is done with it.

MDOC Response

PIH Notice 2010-19, EIV Guidance, requires that a review of any income discrepancy reported in EIV be investigated. In order to investigate a discrepancy, families are required to report any changes in income and household composition regardless of whether the PHA conducts an interim reexamination to reflect the family's reported changes. For this reason, MDOC will continue to require a family report all income and family composition changes.

MDOC PHA Policy

MDOC will not conduct interim increase in income except in following instances or at MDOC's discretion:

At the start and conclusion of the second 50 percent phase-in period of a family's Earned Income Disallowance.

If the family had previously been receiving zero income.

If it had been determined that a calculation error had occurred or the calculation was based on incorrect or incomplete information.

There is evidence or a pattern that the family is manipulating the program by a pattern of reducing income just prior to the annual recertification and increasing its income right after.

If it is discovered a family has a welfare sanction and the rent should not have been reduced and/or any regulatory error.

To admit a family to the Family Self Sufficiency Program.

When an FSS family requests an interim reexamination, any upward change in income will require an interim re-exam if the change results in an increase of escrow account.

Comment

CAP-NWMT Kalispell

Reinstate income-ups for all sources of income. With the cessation of new vouchers, we feel that income-ups would save the state thousands of dollars. Additionally, with stable/diminished caseloads, there will be more time to perform these submissions.

MDOC Response

MDOC has evaluated the impact of this policy and determined the administrative burden outweighed the benefits to the program. Further, the intent of the program is to assist individuals and families rise out of poverty in stable and consistent environments, allowing for them to financially recover and become self-sufficient.

CHAPTER 22 – Housing Quality Standards

MDOC PHA Policy

MDOC has adopted the streamlining rule allowing biennial inspections which was effective July 1, 2016. This will allow for unit inspections to be conducted every two years instead of annually.

Comment

CAP-NWMT Kalispell

Reinstate optional annual inspections to increase client contact, accountability, and unit safety.

MDOC Response

MDOC's decision to move to biennial inspections was instituted to reduce the administrative burden and costs to the program. Annual certifications of income and family composition are still required and offers the opportunity to communicate to clients at least once a year.

CHAPTER 24 – Minimum Rent and Financial Hardship Exemption

MDOC PHA Policy

MDOC will grant a financial hardship exemption from payment of minimum rent if the family meets the criteria pursuant to 24 CFR 5.630.

Comments

Montana Legal Services Association (MLSA)

Unless MDOC or its field agents tell the family, a family will not know that it has the right to ask for the hardship exemption. MLSA proposes adding to this section as follows:

MDOC and/or its field agent has the obligation to notify in writing any participant family that reports zero income that the family may be eligible for a hardship waiver of paying the minimum rent. The notification will state clearly the following:

- * if the family cannot afford to pay the minimum rent, the family may request a hardship waiver;***
- * the procedure for the family to request a hardship waiver;***
- * the criteria for being granted a hardship waiver (pursuant to 24 CFR 5.630)***

MDOC Response

Based on the number of exemption requests MDOC receives each month, we are confident that the field agencies are notifying a family if they qualify to request a hardship exemption.

MDOC will continue to ensure that this information is part of the internal processes performed by the field agencies.

OTHER COMMENTS

CAP-NWMT Kalispell

Table of Contents or quick reference guide at the beginning of the Admin Plan to quickly locate information.

MDOC Response

MDOC concurs with this comment and will provide a table of contents to the Administrative Plan.

District XI Missoula

Clarify rules on income and bedroom size.

MDOC Response

MDOC is unable to adequately address this comment without more specific details.

CAP-NWMT Kalispell

Examine the issue of LIEAP double-dipping with utility checks. We have several households at zero income that we are sending utility allowance checks out to that are already having their utilities paid for through LIEAP.

MDOC Response

The LIEAP Program is funded through the State of Montana's Department of Public Health and Human Services. As such, MDOC does not have the authority to institute any policies or procedures regarding other state agency programs.

COMMENTS TO HOMELESS PREFERENCE

Housing Authority of Billings (HAB)

With a homeless preference, as is with S+C or VASH, field agent administrative duties are increased as the families require greater day to day attention and assistance.

If a Housing Navigator is positioned, by MDOC, in the communities that a homeless preference is designated, this will assist the communities with leasing the homeless families.

I also think that MDOC should provide for deposit assistance for the neediest of these families.

COMMENTS TO PROJECT BASED VOUCHERS

Housing Authority of Billings (HAB)

If MDOC is not able to lease up for the needs in each community I think the option for developers to PBV vouchers in their projects is a great idea.

If the need in communities is greater than field agent contracts allow, I think that field agents should be allowed to lease beyond contract first before PBV is allowed in a given community.

MDOC criteria for PBV would need to be evaluated before one could give full support behind the idea.

MDOC Response to Homeless Preference & Project Based Voucher

MDOC appreciates receiving comments on these subject matters. We will take them into consideration for possible inclusion as we work toward developing these concepts for possible implementation in 2018.