

**ATTACHMENT I  
(ARHA HCVP ADMINISTRATIVE PLAN)**

**MAINSTREAM HOUSING CHOICE VOUCHER PROGRAM**  
(24 CFR §982.207, 24 CFR 982.204(e), (Notice PIH 2020-01), (NOFA FR-6300-N-43))

**INTRODUCTION**

The Alexandria Redevelopment & Housing Authority (ARHA) must ensure compliance with federal laws, regulations and notices and must establish policy and procedures to clarify federal requirements and to ensure consistency in program operation. This amendment to ARHA's HCVP Administrative Plan describes HUD regulations and ARHA policies related to the Mainstream Housing Choice Voucher Program (MHCVP) in six (6) parts.

Part I: The Mainstream Housing Choice Voucher Program. This part includes program background information and a description of the purpose of the MHCVP, the awarding of vouchers, general eligibility, and working with local partners.

Part II: Eligibility. This part describes the general eligibility requirements and definitions for Mainstream Voucher applicants. In addition, this section discusses, non-discrimination & fair housing, and the denial of assistance.

Part III: Waiting List & Preference Administration. This part describes HUD regulations and ARHA policies that govern the waiting list, and new preferences added.

Part IV: Opening the Waiting List & Applicant Selection. The part describes the HUD regulations and ARHA policy for opening the waiting list, notifying the public and selecting applicants for Mainstream Vouchers.

Part V: Mainstream Voucher Utilization. This section describes HUD regulations and ARHA policy on the leasing, continued occupancy, income determination, verification, and portability of Mainstream Voucher holders.

Part VI: Administering the Mainstream Housing Choice Voucher Program. This part describes HUD regulations for administering and reporting on the MHCVP to HUD, including SEMAP.

## **PART I: THE MAINSTREAM HOUSING CHOICE VOUCHER PROGRAM**

**I-A. BACKGROUND, PROGRAM OVERVIEW** (Notice PIH 2020-01, PIH REAC: PHA – Finance Accounting Brief #25, PIH-Notice 2013-15, NOFA FR-6300-N-43).

The Mainstream Voucher Program, (previously referred to as the Mainstream 5-Year Program and/or the Section 811 Voucher Program) was originally authorized under the *National Affordable Housing Act of 1990* (Pub.L. 101-625). The Mainstream Voucher Program provides tenant-based assistance to persons with disabilities. Until the passage of the *Frank Melville Supportive Housing Investment Act of 2010* (Pub.L. 111-374) (*Melville Act*), the program operated as a separate program distinct from the regular tenant-based Housing Choice Voucher Program. The *Melville Act* converted the Mainstream 5-Year Program to the Housing Choice Voucher (HCV) Program under 8(o) of the *U.S. Housing Act of 1937*.

Under the *Melville Act*, except for serving a specific population, Mainstream Vouchers are to be treated the same as regular voucher assistance. In other words, the same regulations at 24 CFR Part 982 (Section 8 Tenant-Based Assistance: Housing Choice Voucher Program) apply to Mainstream Vouchers. There is no authority to treat families that receive a Mainstream Voucher differently from other applicants and participants of the HCV program.

The *Consolidated Appropriations Act, 2018* and the *Consolidated Appropriations Act, 2019* (“2019 Act”) provided funding for incremental Mainstream Vouchers for non-elderly persons with disabilities, in addition to renewal and administrative fee funding.

In 2019, ARHA applied to participate in the Mainstream Housing Choice Voucher Program via NOFA FR-6300-N-43. In November, 2019 ARHA was awarded thirty-six (36) Mainstream Vouchers. Additional Mainstream Vouchers will be available through future NOFAs. ARHA will begin leasing for the program by April, 1<sup>st</sup>, 2020.

**I-B. PURPOSE OF PROGRAM** (Notice PIH 2020-01, NOFA FR-6300-N-43, PIH-Notice 2013-15).

The purpose of the Mainstream Housing Choice Voucher Program (MHCVP) is to provide funding to housing agencies to assist non-elderly persons with disabilities, particularly those who are transitioning out of institutional or other separated settings; at serious risk of institutionalization; currently experiencing homelessness; previously experienced homelessness and currently a client in a permanent supportive housing or rapid rehousing project; or at risk of becoming homeless.

The MHCVP encourages partnerships with local health and human service agencies with a demonstrated capacity to coordinate voluntary services and support to enable individuals to live independently in the community.

**I-C. WORKING WITH LOCAL PARTNERS** (Notice PIH 2020-01, HUD, Mainstream Program Implementation FAQs 3.22.2019, NOFA FR FR-6300-N-43)

A major aspect of the administration of the Mainstream Voucher Program is the PHAs commitment to work with local partners to expand opportunities for individuals and families to access quality affordable rental housing.

ARHA has a history of successful collaborations with local partners which includes; the City of Alexandria's, Department of Community and Health Services (DCHS), Department of Housing, and Continuum of Care (CoC) which utilizes community resources to prevent homelessness in the City of Alexandria. ARHA currently administers a voucher referral program with DCHS (see Chapter 4, Applications, Waiting List and Tenant Selection, 4-III.C. Selection Method).

In administering the MHCVP, ARHA will work directly with local partners who will be assisting with coordinating outreach and referral of eligible persons that meet the PHA's waiting list preference criteria, as well as, assist persons with disabilities to apply to and obtain acceptance in housing programs. In addition, ARHA and local partners will work together to provide ongoing behavioral health and social services to ARHA's Mainstream Voucher holders (on a voluntary basis).

ARHA Policy

ARHA will meet regularly with local agencies to ensure that partnerships remain viable. These local agency partners include but are not limited to; City of Alexandria's Department of Housing, Department of Community & Health Services (DCHS) and the local Continuum of Care (CoC). Meetings will be held to develop plans and discuss potential referrals (once waiting list is opened), continued case management, and available services for Mainstream Voucher holders.

## **PART II ELIGIBILITY**

### **II-A. ELIGIBLE FAMILY & DISABILITY** (24 CFR §982), (Notice PIH 2020-01), (NOFA, FR-6300-N-43), (HUD, Mainstream Program Implementation FAQs 3.22.2019)

The eligible population for vouchers awarded under the Mainstream Program are families that include a non-elderly person (under age 62) with disabilities. This includes, non-elderly disabled who are transitioning out of institutional or other segregated settings, at serious risk of institutionalization, homeless, or at risk of becoming homeless.

#### ARHA Policy

ARHA has been approved for two (2) of the newly available mainstream preferences; ***currently experiencing homelessness*** and ***currently a client in a permanent supportive housing/rapid rehousing project***, ARHA will use the following definitions when discussing Mainstream Voucher Program eligibility (see following section for preferences being added for the Mainstream Program):

1. ***Eligible Family***: A family composed of one or more non-elderly persons with disabilities, which may include additional members who are not elderly persons with disabilities.
2. ***Disability***: ARHA will use the definition of disability which is used in the Housing Choice Voucher Program. (42 U.S. Code §423) for Mainstream eligibility.
3. A Mainstream ***eligible non-elderly disabled family*** is:
  - a. A person 18 years of age or older and less than 62 years of age, and who has a disability and is determined, pursuant to HUD regulations, to have a physical, mental, or emotional impairment that is expected to be of long-continued and indefinite duration and;
    - Substantially impedes his or her ability to live independently, and;
    - Is of such a nature that the ability to live independently could be improved by more suitable housing conditions or;
    - Has a development disability as defined in 42 U.S.C. 6001.
4. Persons ***currently experiencing homelessness*** (NOTICE PIH 2013-15 (HA)) is an individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:
  - a. An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping

- accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground;
- b. An individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, State, or local government programs for low-income individuals); or
  - c. An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution;
  - d. an individual or family who will imminently lose their primary nighttime residence, provided that:
    - The primary nighttime residence will be lost within 14 days of the date of application for homeless assistance;
    - No subsequent residence has been identified;
    - The individual or family lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, needed to obtain other permanent housing;
    - Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:
      - Are defined as homeless under section 387 of the Runaway and Homeless Youth Act (42 U.S.C. 5732a), section 637 of the Head Start Act (42 U.S.C. 9832), section 41403 of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2), section 330(h) of the Public Health Service Act (42 U.S.C. 254b(h)), section 3 of the Food and Nutrition Act of 2008 (7 U.S.C. 2012), section 17(b) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)), or section 725 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a);
  - e. Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for homeless assistance;
  - f. Have experienced persistent instability as measured by two moves or more during the 60-day period immediately preceding the date of applying for homeless assistance; and
  - g. Can be expected to continue in such status for an extended period of time because of chronic disabilities; chronic physical health or mental health conditions; substance addiction; histories of domestic violence or childhood abuse (including neglect); the presence of a child or youth with a disability; or two or more barriers to employment, which include the lack of a high school

degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment; or (4) Any individual or family who:

- h. Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence;
- i. Has no other residence; and
- j. Lacks the resources or support networks, e.g., family, friends, and faith-based or other social networks, to obtain other permanent housing.

5. ***Currently a client in Permanent Supportive Housing & Rapid Rehousing Projects/programs***

- Permanent Supportive Housing (PSH) is built on the premise that housing and services need to be connected in order to ensure the stability of housing for those experiencing homeless. Permanent Supportive Housing Programs assist individuals and families experiencing homelessness by providing services needed to obtain greater self-sufficiency thus helping individuals and families move into permanent housing, with the goal of long-term stability (McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a), Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act of 2009).
- Rapid Re-Housing programs rapidly connects families and individuals experiencing homelessness to permanent housing through a tailored package of assistance that may include the use of time-limited financial assistance and targeted supportive services. Rapid rehousing programs help families and individuals living on the streets or in emergency shelters solve the practical and immediate challenges to obtaining permanent housing while reducing the amount of time they experience homelessness, avoiding a near-term return to homelessness, and linking to community resources that enable them to achieve housing stability in the long-term (Continuum of Care (CoC) Program interim Rule - Federal Register April 1, 2017).

## **II-B. ELIGIBILITY, NON-DISCRIMINATION & FAIR HOUSING (ARHA HCVP Administrative Plan, Chapter 2, Fair Housing and Equal Opportunity)**

Federal laws require that ARHA treat all applicants and participants equally, providing the same quality of service, regardless of family characteristics and background. Federal law prohibits discrimination in housing on the basis of race, color, religion, sex, national origin, age, familial status, and disability. ARHA will comply fully with all federal, state, and local nondiscrimination laws, and with rules and regulations governing fair housing and equal opportunity in housing and employment, including:

- Title VI of the Civil Rights Act of 1964
- Title VIII of the Civil Rights Act of 1968 (as amended by the Community Development Act of 1974 and the Fair Housing Amendments Act of 1988)
- Executive Order 11063
- Section 504 of the Rehabilitation Act of 1973
- The Age Discrimination Act of 1975
- Title II of the Americans with Disabilities Act (to the extent that it applies, otherwise Section 504 and the Fair Housing Amendments govern)
- Violence Against Women Reauthorization Act of 2005 (VAWA)
- When more than one civil rights law applies to a situation, the laws will be read and applied together.
- Any applicable state laws or local ordinances and any legislation protecting individual rights of tenants, applicants, or staff that may subsequently be enacted.

### ARHA Policy

ARHA will treat all Mainstream applicants and voucher holders with the same service, laws, and regulations as all other ARHA HCV applicants and participants.

## **II-C. REASONABLE ACCOMMODATION (ARHA HCVP Administrative Plan, Chapter 2, Fair Housing and Equal Opportunity)**

### **Request for an Accommodation**

If an applicant or participant in any Federal housing program administered by ARHA, including the Mainstream Voucher Program, indicates that an exception, change, or adjustment to a rule, policy, practice, or service is needed because of a disability, HUD requires that the ARHA treat the information as a request for a reasonable accommodation, even if no formal request is made [Joint Statement of the Departments of HUD and Justice: Reasonable Accommodations under the Fair Housing Act].

The family must explain what type of accommodation is needed to provide the person with the disability full access to the ARHA's programs and services.

If the need for the accommodation is not readily apparent or known to the ARHA, the family must explain the relationship between the requested accommodation and the disability. There must be an identifiable relationship, or nexus, between the requested accommodation and the individual's disability.

#### ARHA Policy

ARHA will follow all regulations and policies governing reasonable accommodation listed in the current HCVP Administrative Plan, Chapter 2, Fair Housing and Equal Opportunity, Part II: Policies Related to Persons with Disabilities.

## **II-D. ELIGIBILITY VERIFICATION**

Mainstream "eligible families" must meet the same HUD eligibility verification requirements as any other tenant based voucher applicant.

To be eligible for the Mainstream Housing Choice Voucher Program:

- The applicant family (single or multiple household members) must;
  - Qualify as a family as defined by HUD and ARHA.
  - Have income at or below HUD-specified income limits.
  - Qualify on the basis of citizenship or the eligible immigrant status of



family members.

- Provide social security number information and birth certificates for family members as required.
- Consent to the ARHA's collection and use of family information as provided for in ARHA-provided consent forms.

#### ARHA Policy

When determining the eligibility of Mainstream applicants, ARHA will follow the regulations and policies governing the verification of eligibility which is listed in detail in the current HCVP Administrative Plan, Chapter 3 Eligibility.

### **II-E DENIAL OF ASSISTANCE**

#### ARHA Policy

ARHA will follow the regulations and policies governing the denial of assistance as listed in in the current HCVP Administrative Plan, Chapter 3, Eligibility, Part III.

### **PART III: WAITING LIST, APPLICANT SELECTION & PREFERENCE ADMINISTRATION**

**III-A. THE WAITING LIST** (Notice PIH 2020-01), (24 CFR §982.204, 207), (NOFA, FR-6300-N-43), (HUD Mainstream Program Implementation FAQ, 3.22.2019)

The PHA must maintain one waiting list for all tenant-based voucher assistance. This includes applicants for the Mainstream Housing Choice Voucher Program (MHCVP). In addition, the PHA must follow its waiting list policies and select eligible families in the order they appear with respect to any applicable preferences.

#### **ARHA Policy**

ARHA will maintain only one tenant-based voucher assistance waiting list from which Mainstream Program applicants will be pulled. ARHA will apply all required HUD regulations governing the administration of ARHA's Housing Choice Voucher waiting list to the MHCVP.

**III-B. WAITING LIST APPLICANT SELECTION & PREFERENCES** (24 CFR 982.204, 207, Notice PIH 2020-01, NOFA FR-6300-N-43, HUD Mainstream Program Implementation FAQ, 3.22.2019)

PHAs may use preferences that allow families that meet Mainstream Voucher criteria to move up the waiting list. However, these newly added preferences are available to all applicable HCV waiting list applicants, not only Mainstream eligible families. The PHA must describe in their administrative plan, the method for selecting applicant families from the waiting list, including the system of admission preferences that the ARHA will use [24 CFR 982.202(d)]. The PHA must also have a policy for how families with the same preference will be selected – either in order by the date and time of their application or a random choice technique (24 CFR §982.207(c)).

#### **ARHA Policy**

ARHA has added two equally weighted preferences to the HCV waiting list that will facilitate the selection of “non-elderly disabled” applicants eligible for the Mainstream Voucher Program. These preferences are:

- (1) *Currently experiencing homelessness*
- (2) *Currently a client in a permanent supportive housing or rapid rehousing project*

ARHA will select applicants first by preference and then, if applicants have the same preferences, by date and time of the application submitted to ARHA.

**III-C. UPDATING THE WAITING LIST** (24 CFR §982.204, 207, Notice PIH 2020-01, NOFA FR-6300-N-43, HUD Mainstream Program Implementation FAQ 3.22.2019)

Waiting list administration is up to the PHA and there is no requirement to open the waiting list to administer Mainstream Vouchers if it is confirmed that there is a suitable amount of Mainstream Voucher eligible families on the waiting list that meet the preference category claimed.

ARHA Policy

ARHA will not open the tenant-based HCV waiting list if it is confirmed that there is a suitable amount of Mainstream Voucher eligible families on the waiting list that meet the preference categories; a client in a permanent supportive housing program/residence or rapid rehousing project, or are currently experiencing homelessness.

If the waiting list does not have a suitable number of Mainstream Voucher eligible applicants the PHA may update the waiting list.

***Updating Waiting List for change in eligible population:*** PHAs may choose to do a *full waiting list update* if there is not a suitable number of Mainstream eligible applicants. A full update may be done regardless of whether a PHA will be opening the waiting list or not.

A ***Full Waiting List Update*** is performed on the entire existing waiting list to determine if all current applicants meet the eligibility criteria for Mainstream Vouchers and the new preferences that were adopted. This also ensures that the PHA is offering the opportunity for current applicants on the waiting list who qualify for the Mainstream preferences to receive the benefit of the preference and move up on the waiting list accordingly.

ARHA Policy

When performing a *full waiting list update*, ARHA will notify all currently active tenant-based HCV waiting list applicants that new preferences have been added. The notice will include information on how to successfully apply and establish their preference status. In addition, ARHA will provide with each notice, a preference update form which, may be directly (in office) or indirectly (mail, email) submitted to ARHA.

ARHA will also make available preference update forms for partnering agencies with whom ARHA may be working with in order to identify current waiting list applicants eligible for newly adopted Mainstream preferences.

## **PART IV: OPENING THE WAITING LIST**

**IV-A. OPENING THE WAITING LIST** (Notice PIH 2020-01, 24 CFR §982.204, 207, NOFA, FR-6300-N-43, HUD Mainstream Program Implementation FAQ 3.22.2019)

The PHA may adopt criteria defining what families apply for assistance when opening its waiting list (24 CFR §982.206(b)(1)). For example, with respect to eligible applicants under the Mainstream Program, if the PHA opens its waiting list for solely these applicants, the PHA must provide public notice that it is opening its waiting list specifically for non-elderly persons with disabilities who are eligible for at least one Mainstream specific preferences.

### **ARHA Policy**

If there is not a suitable amount of Mainstream Voucher eligible families on the waiting list that meet the preference categories, ARHA will open its waiting list specifically for non-elderly disabled applicants who are claiming Mainstream preferences. ARHA will comply with the requirements for opening the waiting list under 24 CFR §982.206, including the requirement to provide public notice and to accept applications from families for whom the list is open.

When ARHA opens the waiting list, ARHA will provide public notification to our local social services partners (and ask that they post the notification) and, will provide notification at the following locations:

- ARHA web site
- City of Alexandria's web site
- ARHA's main office
- Local partnering agencies

## **PART V: MAINSTREAM VOUCHER UTILIZATION**

### **V-A. VOUCHER UTILIZATION** (Notice PIH 2020-01, NOFA, FR-6300-N-43, HUD Mainstream Program Implementation FAQ 3.22.2019)

Once a Mainstream eligible applicant is pulled from the waiting list they are subject to the same regulations and policies governing all tenant-based housing choice applicants and voucher holders. This includes but is not limited to, verification of eligibility, voucher utilization, leasing, income/subsidy determination & verification, annual re-examinations, and all other regulations and policies that are applied to tenant based voucher holders in this Plan (ARHA, HCVP Administrative Plan), unless noted otherwise.

Once a Mainstream voucher is issued to a non-elderly, disabled Mainstream eligible family, they cannot “age-out” of the Mainstream subsidy.

### **V-B. PORTABILITY**

Portability is a required feature of the Housing Choice Voucher Program (§8(r) of the U.S. Housing Act of 1937). Applicants where the head, co-head, or spouse did not have legal domicile in the PHA’s jurisdiction at the time the family first submitted their application do not have the right to portability until they have leased a unit in the jurisdiction for 12 months, however, the PHA may choose to allow portability during this period (CFR §982.353(c)(2)). PHAs must keep in mind that persons with disabilities may request a reasonable accommodation to port out before meeting the one-year residency requirement if there is a nexus between the person’s disability and their need to move out of the jurisdiction.

If a Mainstream Voucher participant ports to another PHA and the receiving PHA chooses to bill the initial PHA, then the voucher will remain a Mainstream Voucher. If the PHA chooses to absorb the voucher, the voucher will be considered a regular Housing Choice Voucher, or a Mainstream Voucher if the receiving PHA has a Mainstream Voucher available, and the Mainstream Voucher at the initial PHA will be freed up to lease to another Mainstream-eligible family.

#### ARHA Policy

ARHA will not permit Mainstream Voucher portability for voucher holders where the head, co-head, or spouse did not have legal domicile in the PHA’s jurisdiction at the time the family first submitted their application until they leased a unit in the jurisdiction for at least twelve (12) months.

ARHA may allow portability for Mainstream Voucher holders as a reasonable accommodation before the twelve (12) month period on a case-by case basis.

## **PART VI: ADMINISTERING THE MAINSTREAM PROGRAM**

**VI-A. VOUCHER ALLOCATION, UTILIZATION & LEASING** (Notice PIH 2020-01), PIH REAC: PHA – Finance Accounting Brief #25), (HUD, Mainstream Program Implementation FAQs 3.22.2019), (NOFA, FR-6300-N-43)

In November, 2019, ARHA was awarded thirty six (36) Mainstream Vouchers with the opportunity to apply for additional vouchers via HUD grants in the future. HUD expects that PHAs will make every effort to utilize at least 80% of awarded vouchers within the first year of receiving them. After the first year of program administration, HUD reserves the right to recapture and reallocate funding if the PHA does not comply with the terms of an 80% leasing rate. In addition, if the PHA does not maintain a leasing rate of at least 80% after the first year, HUD may recapture and reallocate the funding.

**VI- B. HUD PIC & VOUCHER MANAGEMENT SYSTEM (VMS) REPORTING** (Notice PIH 2020-01, NOFA, FR-6300-N-43, HUD PIH-REAC: PHA Finance Accounting Brief, #25, HUD Mainstream Program Implementation FAQ)

### **PIC Management**

Mainstream Voucher assistance will use the HUD-50058 to submit tenant information to PIC just as it does for all other vouchers. However, to distinguish the Mainstream Vouchers from regular tenant based vouchers, the PHA must code Section 2 of the HUD-50058 differently. In addition, for PIC to receive and count the HUD-50058 for the Mainstream Voucher transaction, at least, one family member who is non-elderly (under 62 years of age) and disabled must be indicated on the 50058.

PHAs must use line 4c “Homeless at admission? (Y or N)” of the HUD-50058 to accurately report whether the family being admitted to the program was homeless at the time of admission.

In cases of portability, the initial PHA must include “MS5”, as applicable, on the HUD-50058, Family Report sent to the receiving PHA. Receiving PHAs must maintain the “MS5” code on their Family Reports for the duration of the family’s participation in the Mainstream Voucher Program if the receiving PHA is billing the initial PHA. ***The PHA should not code more families than the number of Mainstream Vouchers awarded.***

### **VMS Management**

In order to indicate the allocation of Mainstream Vouchers, HUD requires the PHA to include the number of Mainstream Vouchers in the Voucher Management System (VMS). This includes any additional Mainstream Vouchers that may be allocated via NOFA in the future.

In the case of portability, if the PHA chooses to absorb the voucher, the voucher will be considered a regular voucher and the Mainstream Voucher at the initial PHA will be freed up to lease to another.

**VI- C. SECTION EIGHT MANAGEMENT ASSESSMENT PROGRAM (SEMAP)  
Indicator 13 (Lease-up)**

For the Section Eight Management Assessment Program (SEMAP), Mainstream Vouchers, excluding all new awards for the first year, must be included in the utilization rate for the purposes of determining the PHA's overall utilization under Indicator 13. PIC's calculation of the Lease-up indicator incorrectly excludes Mainstream Vouchers from consideration. The Financial Management Center (FMC) determines the Indicator 13 utilization rate for all PHAs using VMS reported expenses and leasing and sends the calculations to the appropriate Field Office to distribute to the PHA. Using VMS, PHAs can approximate their overall utilization rate for SEMAP by adding the Mainstream 5-Year data to the overall HCV program data.