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>> That is correct.

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>> Perfect.

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>> I think people are starting to hop on, hi everyone.

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>> I everyone, thank you for joining we will wait a few minutes for people to join before we start.

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Now I can morning everyone.

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Welcome to today's webinar. What advocates need to know about small area rents.

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I am a staff attorney with the National housing Law Project.

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NHLP is a national legal advocacy Center advocating advancing housing justice for poor people and communities,

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strengthening and enforcing the rights of tenants, increasing housing opportunities for underserved communities, and preserving expanded donations supply safe and affordable homes.

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We hosted today's webinar

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along with the poverty rates research Council and I'm going to hand it off to fill to introduce PRRAC.

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>> Thanks so much.

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I am the director of the PRRAC Council and we are a civil rights policy organization based in Washington DC.

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We work on housing and education policy and the connections between those two.

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In the housing space our work is really focused on implementing the affirmatively further fair housing obligation.

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Big federal housing programs.

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In the context of this webinar, a lot of that work is been around housing choice voucher reform in the expansion of housing mobility programs and we've done a lot of work

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with public housing authorities on that issue along with our partner organization mobility works.

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Around the country.

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Also, we are working to support kind of the general goals of social housing in the context of federal housing programs.

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So that is some of our work, and hopefully most of you know us or the housing justice network.

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Where we try to be fairly active.

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>> SPEAKER:Thanks Phil.

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I just wanted to give a quick plug for the green book, most topics we covered today are covered in the green book so if you do not have access, speak to your supervisors about getting access.

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For today's webinar, we will provide an overview of the small area fair market rents, discuss research developments and have a key advocacy points as well as the implementation timeline.

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And handed off to amazing advocates from Florida and Philadelphia to discuss their experiences in the original mandatory jurisdictions.

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And we hope you have a few minutes left at the end for questions however as audience members, you do have access to that you and a box

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, so while that checkbox is closed, feel free to add in your questions, in the Q&A box . We will try to monitor that during the webinar.

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And we will try to answer those questions during the presentations or save some for the end.

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Life captioning is also available, so feel free to use them.

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And I'm going to hand it off to Deb.

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>> SPEAKER:I am Deborah the rope work with Layla Deputy Director at the National housing Law Project.

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I will set the stage before I pass it to fail before he tells you an interesting history of this particular policy.

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So small Allie area FMR are a fair housing policy that addresses a D concentration of voucher families.

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It is important to distinguish FMR, fair market rent with small area fair market rent.

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Fair market rents which is historically has used you said subsidy amounts for the voucher program really deals with large geographic regions.

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And because it sets the FMR's using these large regions, often times a subsidy level doesn't match the local market rent. So that is something many US advocates get to experience. ECD FMR the rents reflected in FMR are granular enough to match that neighborhood.

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Small area FMR's contrast and calculate the value of the voucher based on ZIP Codes.

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So the much more able to capture different rents in various neighborhoods.

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And again they are more granular.

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It's a more granular methodology.

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So what that means, small area FMR's open up housing for voucher families and lower poverty neighborhoods otherwise inaccessible when Housing Authority uses the FMR to set those rents.

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And also as many of you know, in the communities you are working on, that you are working voucher families have a hard time finding housing let alone housing in what HUD calls area of opportunity.

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So higher resource areas.

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So small area FMR's are one tools of many in the Housing Authority's toolbox to expand housing joys and mobility and open up housing in those neighborhoods.

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And other tools are mobility services, for example, and if the Housing Authority provides incentives to landlords to have a voucher tenet or funding for security deposits, that's an example in the Housing Authority toolbox to open up these opportunities.

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And with that, I will pass it to fail because there's a very interesting history here around small area FMR's.

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, I guess.

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So, this is a civil rights policy.

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And it was actually started by a civil rights lawsuit.

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Inclusive communities project versus had in 2007.

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Which challenge their ways the regional fair market rent approach tends to steer families into poor segregated neighborhoods

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by lowering the rents.

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And I gets pretty extraordinary it took this time for someone to bring this lawsuit since people have been talking about it.

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Before 2007.

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But it is remarkable the way they frame the complaint.

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They said that HUD uses the rents in predominantly minority and low income concentrated areas to set the maximum rents for use in predominantly white and low income concentrated areas.

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That's traditionally what the FMR system does and you see it framed and that because I intentional way is kind of remarkable.

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And it was a disparate impact crime, with the fair housing impact and under the administrative procedure act. Next slide.

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So they case fairly quickly led to a settlement agreement which included annual publication of small area FMR's within the register and the Lodge of the small area fair market rent demonstrations five PHA's, and immediate implementation of small area fair market rents in the Dallas Metro area.

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The initial results from the small area fair market rent demonstrations showed promise, there were increased moves to opportunity areas.

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Similar per-unit costs for the voucher programs.

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No impacts on lease upgrades and success rates.

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In June 2016 HUD went forward with a proposed rule and got their final small area

FMR rule implemented in November 2016.

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Just before the end of the Obama administration in 24 Metro areas.

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And then of course soon after coming in to take over HUD in the Trump administration Sec. Carson suspended the small area fair market rent rule,, and this turned out to be one of the first major challenges to all of the Trump

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deregulatory actions and it was really a major fire drill for all of us in DC in the fair housing groups because coming together to the challenge we had to learn everything we could about the administrative procedure act, we will able to get success in that case.

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With a preliminary judgment in December 2017 from Judge Barrow how in the District Court in DC. The same judge who ruled against us later in the AF AH suspension, rule suspension case.

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It was an important gaze, two of the planes were women with children who needed to get into these higher opportunity areas in Chicago in the Hartford region.

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For better schools for their kids, and better access to where their jobs were.

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Pretty compelling case filed primarily under the ABA but also with fair housing act claims.

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So in 2018, HUD did a good job of scurrying to respond to the induction and in April 2018, launch the small area FMR program in the 24 Metro's.

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And pursuant to this regulation five years later, they share that rule was extended to 41 additional Metro areas.

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And hopefully many of you are here today from those Metro areas.

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Small area FMR's now reach almost half of families with vouchers in the US.

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In January, the program goes into effect -- the rest of the year will be a huge opportunity for advocacy in those 41 new Metro areas to make sure that the program is implemented in a way that is favorable to tenants in the civil rights goals of the rule.

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I will say one more thing . I'm trying to move this along, but it's very interesting there were only one additional Metro areas added. In terms of the criteria HUD uses to select a small area FMR which is primarily about how concentrated boundaries are in high poverty areas,

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and whether there's a significant number of rental units available in the higher cost areas.

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There were a lot of Metro areas that just missed the cut in 2018.

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And a lot more areas that cross that line in 2023.

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Which piece to the fact that the voucher program has gotten somewhat more concentrated.

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During that time.

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A lot more of these Metro areas came into the program.

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So, I'm going to quickly go over some of the recent and forthcoming research on small area FMR's because it's important to know particularly when engaging with PHA and the public

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trying to talk about this -- the impact of this policy, first of all, the effects for new voucher recipients both the original demonstration study, and the studies of the 24 metros has shown that new voucher holders

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are more likely to move to lower poverty ZIP Codes.

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And more likely to relocate out of high poverty ZIP Codes and this is even more maybe even higher for families with children according to one study. Next slide.

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For existing voucher families as opposed to new voucher families, the effects are very similar.

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Slightly less and again higher for families with children.

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There is one area of research that has not been delved into which is the wide variation across different small area FMR Metro areas.

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And people aren't sure exactly what's going on there because that's just a fascinating thing for folks to dig into in their region.

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Why is this going to be more or less successful in our area, is there source of income discrimination laws?

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What does the rental market look like in terms of the organization of the market and the role of real estate agents, larger landlords versus small.

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You don't really know what's going on in terms of these variations.

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Very importantly, the average per-unit cost for public housing authorities did not rise more quickly in the small area FMR Metro areas than in very closely comparable

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regions that did not have small area FMR's.

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This is quite consistent with the small area fair market rent demonstration which on the average per-unit cost decline, but of course the demonstration was

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a starker display of the small area FMR rule . It did not have the protections against dramatic drops and FMR in lower rent areas. But still even in the implementation in 2018, we did see a cost increase going up at a faster rate.

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Dented small area FMR areas.



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Effects of lease ups, no effect on voucher success rates even for families who are starting in low rent neighborhoods.

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In that research should be coming out pretty soon. Of course, for PHA's with very limited areas of jurisdiction, where all the neighborhoods are low rent neighborhoods, there is a higher rate of poor outs for families.

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Taking advantage of higher rents outside jurisdiction and fewer options inside the jurisdiction.

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This is more like for the economist in the crowd.

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There is a small but measurable effect on rent levels . The more families you have moving out of higher poverty neighborhoods that affects the rent that causes the rent to decline.

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In the more families you have moving into the higher rent areas, there is an uptick in the broader rents level.

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This shows anyway how the small area FMR program can be very beneficial to other low income families who do not have subsidies living in the lower cost areas.

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And we have a bibliography on our website which has a lot of the studies in it if you want to dig deeper. Next slide.

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One important point I wanted to raise, of the mandatory small area FMR regions in 2018 only four of these regions have established housing mobility programs.

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Families were getting assistance to help them move to higher opportunity areas only 4/24 places.

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So that research I had just gone over about families moving into higher opportunity areas, those are families doing that on their own purely as a result of the change of rent levels.

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That being said, for any mobility program, this is a necessary policy that you have to implement.

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In almost all of the existing mobility programs in the US have it. If they're not in a mandatory area, they've adopted mandatory exception payment standards based on small area FMR's to basically help their program be effective.

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Finally, my last research slide.

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We sponsored a study in 2019 to look at how PHA are using standard flexibly, the flexibility to go from 9210% of the small area FMR in implementing.

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And we found the authors of the study from SUNY, Buffalo, talked about that terms of fidelity, and the policy goals of the rule.

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Fidelity meaning if they were keeping the rents at 100% of the small area FMR in both the higher rent and lower rent neighborhoods.

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And then examples of very high fidelity were PHA's going up 210% in the higher opportunity areas and reducing the rent even lower in the low opportunity areas.

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And low fidelity PHA's which were I think the majority where they were trying to blunt the impact of the small area FMR rule.

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Mostly I think, out of unmerited fears of budget impacts.

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By reducing the payment standard in the high rent areas down to a 90% of the small area FMR increasing the rents in the low rent areas up to and including 110% of the small area FMR. That's what we would call low fidelity and that was a problem early on in the program and I will pass it back to Deborah.

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>> SPEAKER: Before you go fill, there is a question and is a good time to address it.

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This is related to their research.

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And we will get to this when we talk about facts in a small area FMR.

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There's a question and not about housing authorities that adopt small area FMR's surplus families?

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There is no evidence that they are serving less people.

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>> The per-unit cost seems to not be affected.

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There is really no evidence that fewer families are affected.

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I think that this is a function of several aspects of the rule.

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One is that on a year-to-year basis, a fairly small number of families moving into the higher rent areas unless you have a really strong progressive mobility program in place. Secondly, especially for new families looking for housing, you have a significantly lower payment standards in the neighborhoods where most voucher families are looking.

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Which reduces your cost.

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And by and large and there are exceptions to this.

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The ZIP Codes that get the higher payment standards are not usually ZIP Codes where a lot of families are already living.

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If in that rare instance where a ZIP Code goes significantly up in terms of the payment standard and you have a lot of families who are paying over 30% of their monthly income for rent, that is the one kind of situation where the PHA

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can see a significant budget hit where they have to start covering in the next recertification writ they have to start covering all of that excess payment that the tenants were paying.

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But again, that is kind of rare.

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Because of the way that traditional FMR system has worked as alleged in the Texas case . You don't see many families living in those higher rent neighborhoods with vouchers.

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>> SPEAKER:Thanks so much Phil.

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Next slide please. Now, we are going to get into a bit of just a key advocacy points related to small area FMR's. We are going to talk a bit about it and then you are going to see how this plays out later in the webinar

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when you hear from advocates in jurisdictions that were mandated to adopt small area FMR's in round one.

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So those with a 2016 rules.

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So first, and this is important, a housing authorities can implement small area FMR's.

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We are focusing now on the mandatory jurisdictions, and even housing authorities that are not a mandatory jurisdictions can adopt the rule.

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But HUD has also made it really easy to adopt small area FMR's for certain ZIP Codes.

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So if the Housing Authority says hey we want to increase housing opportunities these high rent neighborhoods, we can actually does it go by ZIP Code breezy, they just have to notify HUD

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if they want to do this in order to expand the housing choice in higher rent areas.

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And we are going to talk a bit about myths and facts in a minute for those of you who are nonmandatory areas but think this is a great policy and would love to work with your PHA

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to try to get them to adopt it.

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So in areas that do adopted, advocates working mandatory areas with housing authorities that voluntarily adopt small area FMR, probably the most important

thing to advocate for is safeguards

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for tenants in those areas where the subsidy amount will go down.

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So the small area FMR is actually less in the FMR.

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And HUD allows for hundred percent hold harmless policy.

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Meaning it allows housing authorities to not raise the rents on any of those tenants where the rent or the small area results

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to pay a higher rent for those tenants.

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And we have sample language we will show you in a minute that housing authorities can adopt their page and plans that will hold those tenants harmless.

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Short of holding tenants harmless, housing authorities can also phase in rent increases over time.

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That's also allowed under the regulations. And if they don't adopt either of those policies into the regular rule which tenants will see likely to increase payment standards

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of the second annual recertification, so there is still some time.

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But important to note that if the tenant DC rent increases, the Housing Authority is to provide at least 12 months in advance subject to that increase. And similarly, the best practice for housing authorities is to notify tenants in any case of the new and all payment standards.

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And US advocates can always request a copy and review those notices before they go out. What we were working with advocates in round one, we read some notices from housing authorities that require complicated and confusing.

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And this is really complicated stuff around small area FMR payment standards.

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So you know, make sure you review those notices to make sure they are easily

digestible in format.

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For various stakeholders.

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But I notice is really important.

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Next is reviewing all the payment standards.

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To avoid those low fidelity issues that Phil was talking about.

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And especially at MTW agencies that have a bit more flexibility than other housing authorities.

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And Phil will talk about MCW in a minute.

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And monitoring off-balance.

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Housing authorities under the rule, oh sorry, I should say -- are important and in Broward County they use groupings.

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So we will hear about them more as well.

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Soon.

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And monitoring housing authority exemptions. HUD does allow a Housing Authority to opt out due to adverse housing conditions is defined relatively broadly.

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But HUD does have some guidance on its website and provides examples like in the case of disaster.

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At the Housing Authority would be able to opt out due to adverse housing conditions. That something to look out for.

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In the last is a consideration around project-based vouchers.

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Housing Authority's, project-based vouchers are exempt from the rule that housing authorities can apply small area FMR's two new project-based vouchers.

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The reason HUD did this is because PPP's have different considerations around ensuring financial stability and properties that these factors don't have. So HUD has exclusively exempted them but housing authorities can consider it for new projects.

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So here is a sample, I will not read it just now you will have to signs afterwards.

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Please.

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Okay were going to do quick myth versus reality but we covered some of this already.

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These are things you will hear from your Housing Authority if you are doing this advocacy in a nonmandatory jurisdiction.

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What about MCW who chooses not to implement. First we can adopt small areas because it's too expensive to implement. Phil went over this. There's a per unit cost not rising in a small area and on top of that housing authorities are also eligible to receive extra administrative fees for the implementation small area FMR's.

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If we had up small area FMR's we will serve less families, we covered this as well. There is no evidence that small area FMR's cause Housing Authority's service people because they don't negatively affect the budget.

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There is not any housing available in higher resource areas anyway.

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There's a lot wrong with a statement.

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But of course PHA should be doing outreach to land those higher opportunity neighborhoods.

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Gently expanding their efforts to promote housing opportunities through small area FMR mobility counseling.

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HUD noted a notice came out this week HUD is providing funding to PHA's to do some planning around mobility counseling.

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It's also important to note a mandatory small FMR areas that are inherently metro areas that have a significant number of rental units in high cost areas. That's part of the methodology.

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Those are some key advocacy points and I will pass it back to Phil to wrap us up before we hear from advocates and talk about how this played out in our agencies.

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>> SPEAKER:Thank you.

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I was just attempting to write an answer to one of the questions and then chat.

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I will get back to that, sorry.

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In fact opinion study done by those Buffalo researchers I talked to, we found that the MGW agencies that were among the original 24 metro areas and they are listed here on the screen, most of these PHA are implementing alternative rent policies as they are permitted to do under the rule.

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With fairly good fidelity to the goals in the spirit at the small area FMR rule.

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But several PHA's were not.

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Acting into fidelity of the rule.

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And they were depressing significantly depressing the rents of high-end and increasing them into the land and really blunting the impact rule inside their area of operation.

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At least one PHA was actually using old FMR's to set the rent significantly lower than what the small area FMR would have required.

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So within the 41 new metro areas, here are the M tab -- MGW PHA's that in theory are allowed to adopt alternative rent policies.

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Instead at the small area FMR and it will be extremely important for advocates to monitor and engage with these PHA's in particular to make sure the alternative rent policy is consistent with the small area FMR for that region.

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So a few, I guess you call them advocacy tips.

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We're hoping HUD comes out with some guidance on this soon. We are expecting it.

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But the intent of the small area FMR rule is to increase housing mobility, give families access to higher opportunity neighborhoods, and we think we believe MGW agencies are supposed to adopt

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alternative rent policies consistent with the rule even though that's not written out explicitly. But it is a part of their affirming voluntary for housing.

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Jeffrey payment standards that dip below hundred percent of the small area FMR and opportunity ZIP Codes.

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Watch out for PHA's and adopt and W's that adopt brought tears that tend to group ZIP Codes together and pull down the payment standard in some of the really high-end ZIP Codes.

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And especially watch out for MGW agencies that are not using the current small area FMR.

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If an agency is trying to set payment standards below the small area FMR in high opportunity areas, I think advocates should demand specific justification, and even start to complain through the affirmatively fair housing process if we still have my next year.

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High-capacity PHA's should be encouraged to use dated more granular the ZIP Codes.

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Sometimes indents cities ZIP Codes are not great in terms of establishing a housing market, a coherent neighborhood rents level.

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In several PHA's, the first time around did a really nice job of looking at the census tract level to get a better sense of how rent should be set in neighborhoods within a ZIP Code.

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That is kind of a best practice and a flexibility that MTA Debbie is have that other PHA's do not.

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I will stop there and go back to the other side.

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>> SPEAKER:Thanks Phil and we just have a little bit before we had enough you Jeff.

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But in October But in October 2023 HUD published a list of 41 expanded metro areas.

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Notice included in inflammation date October 1, 2024.

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In PHA's operating in the newly designated metro areas will have until January 1 In PHA's operating in the newly designated metro areas will have until January 1, 2025 to implement small area FMR standards. In determining those metro areas HUD use the same selection criteria previously used . I will go into all of them, these are the five

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criteria on the side and as Phil explained her goes into the concentration of doctors.

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And so in 2018, HUD published implementation guidance and notice PIH 2018 01. So while had plans to implement that guidance until then the provisions of that notice from 2018 remain in effect.

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And HUD does not plan for the updates that it will make to make any substantive changes that would impact a PHA small area FMR implementation.

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So PHA's operating in newly designated small area FMR areas will receive \$10,000 to offset the administrative costs of the transition to small area FMR rents.

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And HUD will automatically disperse those payments to them mandatory jurisdictions.

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And when it comes to updating PHA administrative plants mandatory jurisdictions do

not need to update their plans to indicate that they will adopt small area FMR. However, all administrative plants by state how he PHA will handle decreases in payment standards for families under a contract.

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And if you're not in jurisdictions request is approved, they must send an amendment saying they will operate according to small area FMR.

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So before handed off for they case studies, I want to highlight a few helpful resources.

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NHL P and create a one page is for information for mandatory and voluntary jurisdiction.

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NHLP also updated the memo on the small area FMR expansion. These resources will be sent out with the last marketing email.

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But attendees will again receive copies after the webinar along with the sides and a recording of the webinar.

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HUD has a page on small area FMR implementation great resources such as a guide but, sample documents, case studies, and more.

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PRRAC has stuff on their website.

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And if sharing a screenshot to highlight the small area FMR - work that's available on HUD's website which shows which PHA has adopted small area FMR.

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This is a really helpful dashboard that allows you to drill down on state and PHA level data.

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And with that, we are moving on to the most anticipated portion of the webinar to hear from advocates with experience implementing small area FMR regional jurisdiction.

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So Jeffrey, he will discuss his expense and self order and Rachel will discuss her experience in Philadelphia. With that, I will pass it off to Jeff.

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>> There were periods of confusion and ultimately we've had success.

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At first there was the fear of change.

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Housing authorities kind of gut reaction that this would cost them more money.

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We heard them say we will have to issue vouchers and this could put us into a budget shortfall.

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Then there was confusion.

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Without wide discretion they were given from HUD housing authorities had questions about how to best implement the small area fair market rent rule.

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The Broward County has about 75 ZIP Codes.

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And we have six different housing authorities.

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We are in South Florida.

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Including Fort Lauderdale.

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And we are just north of Miami.

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All six of our housing authorities in Broward decided to group ZIP Codes into zones.

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They would take 10 ZIP Codes, group them together, and call that zone one.

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They would take another 10 ZIP Codes group them together and call that zone two.

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Each Housing Authority Druids map a little differently.

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There was not much consistency.

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The same apartment could have six different payment standards depending on which Housing Authority was administering the voucher.

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Setting the payment standards the general trend in Broward raised rent caps in low income neighborhoods.

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And though it rent caps and higher income neighborhoods.

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In Phil, just what we saw is consistent with the research you cited.

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The results were the opposite of that goal.

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It gave people incentive to stay in low income neighborhoods.

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Made it harder for people to move into this higher income neighborhoods.

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Housing authorities in the low rent neighborhoods set the payment standard 210%.

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As you will see in the top line of the chart there.

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And that in the higher rent neighborhoods, they tended to set the payment standards closer down to 90%.

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We saw consequences for voucher holders in those areas where the payment center was reduced the landlords were not very happy about that.

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They felt like they could get more rent in the private market and we did see displacement of voucher holders who had been long term tenants and then ultimately forced to move.

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We had a couple other mandatory jurisdictions across Florida Tampa adopted similar policy to what we saw in Broward County.

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Interestingly it north part they said every single payment standard at 100% on the other end of the scale in the Palm Bay area they said all their payment standards down to 90%.

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Jacksonville.

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Great results from terrific advocacy by Jacksonville area aid, a legend by the name of Don Freeman. A big part of that.

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From the beginning, Jacksonville set a payment standard with each individual ZIP Code and adopted a strong policy and it was as if they read all the NHLP suggestions and follow them to the D. Next slide.

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Ultimately we seen success . The housing authorities were responsive to advocacy.

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People like Laura Schwartz, we had a legal aid Hall of Fame.

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Lori would be in it.

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What we saw, the most effective advocacy strategy I think meeting with the director of the housing choice voucher department at your Housing Authority.

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Sharing the concerns and the issues that we were seeing as the rule of being ruled out.

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They keeping the lines of communication open to keep providing that feedback.

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Attending Housing Authority board meetings.

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Our board meetings, I don't just get passed unanimously, not much debate.

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When advocates gave public, about the fair small area fair market rent will, not the housing -- they got the Housing Authority boards to pause and listen and respond to the concerns that were being raised.

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Now we seen some of our housing authorities go away from that.

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The grouping concept and set small area fair market rent based on individual ZIP Code.

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Voucher holders told us what was moped most helpful when they got clear easy to understand material from their Housing Authority on this new rule.

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Specifically on the mechanics of it.

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Allen changes the way that they can search for new housing.

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Along with housing authorities who took the time to explain the benefits of small area small market rents, encouraged people to move to higher opportunity neighborhoods.

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It will be interesting to watch and see how this continues to develop. And I think our story underscores how critical advocacy is here. Making change.

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>> SPEAKER: Thank you so much Jeff. I will pass it on to Rachel to discuss her experience in Philadelphia.

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>> Seven Philadelphia, it is been a number of years now since we've had small area fair market rent.

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One of the things I wanted to highlight in addition to what I said before is when you switch from fair market rent to small area fair market rent, in addition to the payment standards going up.

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And that lower poverty ZIP Codes, be prepared for the fact the payment centers are likely going to go down in most of the ZIP Codes your clients are currently

renting.

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His hit is a little bit by surprise and since the vast majority of clients we work with are living in the higher density poverty neighborhoods in Philadelphia, in many ways the rent was also inflated so he ran into a lot of trouble with language is being used to a certain amount of rent they could expect to receive from the Housing Authority for contract rent. And being unwilling to adjust their asks when the Housing Authority switched the payment standards. So it became very difficult for a per

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410 is defined housing. Philadelphia is a large jurisdiction the county and city overlap this is what the payment standard schedule looks like.

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It is very helpful the Housing Authority posted on their website so when we are working with tenants who are looking in a particular ZIP Code we can look at the payment standards with them online. We can look at the ZIP Code.

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You could see Philadelphia does group it into tears.

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Which is as I'm learning on this call, not the best option.

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But we can talk through with their clients what tier they fall into.

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And what's a reasonable expectation is.

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In terms of what the Housing Authority might pay for a unit in that jurisdiction.

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And we are finding that it continues to be very difficult for tenants to find places to run to.

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There seems to be a disconnect between what the Housing Authority is willing to pay and what landlords think they should be able to receive a lot of that is due to the rapidly rising rents.

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One of the things that Philadelphia has done which has been great as every October at least the past few Octobers when HUD has allowed an increase in the payment status, Philadelphia has matched that increasing the payment standards effective October. They remind us every October that they have 90 days to adopt the new payment standards.



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But even though they said that they actually gone ahead and done it effective October 1. So as you can see what they are doing here, this map is really helpful because you can see the areas that they have in blue which is group 1 which is the lowest level of the payment standards are the areas of concentrated poverty in Philadelphia and often the areas where the vast majority of voucher holders have been able to find landlord's willing to rent to them.

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In the purple lesser extent in the yellow areas are areas of high opportunity and the lowest concentration of poverty and these are landlords that are not necessarily used to renting to voucher holders.

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We have source of income protections here in Philadelphia.

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There are not a lot of teeth to them so we still see many ways in which landlords especially in these higher opportunity neighborhoods.

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Larges failed to take the steps necessary in order to rent to them.

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They don't take the class that PHA requires in order for landlord to participate.

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They don't pass the inspection and failed to make so even though we do have source of income protections it is often very hard to enforce them . Next slide.

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Never mind.

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So the only other thing I like to throughout their is in addition to advocating for it is a policy change overall it's important to think through the individual advocacy that are part of a legal services agency you will still have to deal with each individual tenant when they run into issues with their payment standard that's going to continue whether it's fair market rent or small area fair market rent something such as reasonable accommodations and making sure tenants receive the number of be,

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There are ways to advocate for tenants to get what it is they need beyond just the small area fair market rent.

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Thank you.

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>> Thank you so much Rachel.

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And Debbie been monitoring the chat so I don't know if there are specific questions to pull up?

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First of all thank you all so much.

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Excellent to hear about all of your experiences.

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I'm going to moderate some of the questions and we will get to as many as we can.

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I will start with questions for Rachel and Jeff.

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So first Jeff, there was a question about you enlisting the public records on the slide as a strategy you were going to learn more about small area FMR and advocacy.

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You want to talk about what types of public records you're making a request for and how they were helpful?

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If you don't have a good relationship with the Housing Authority where you can just call up our email they send it back over to you, that is an option and you do it as Rachel talked about comparing all payment standards with the ones just making sure everything is matching what the policy says it should.

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>> Thank you so much we always have sample public records act request.

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If people need them.

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To send to the Housing Authority.

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It's always a good ask of our network as well.

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Thanks Jeff so one more question for you Jeff.

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So a question around the fidelity issues.

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Because he really described how that plays out in various jurisdictions in Florida that were mandatory way back when.

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So can you talk a little bit about the differences. Because it sounds like Tampa was just -- the approaches with Tampa as opposed to Jacksonville.

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>> SPEAKER: Think Tampa was similar to us in Brower. Hello fidelity on the payment standards and then Jacksonville did a lot of advocacy before the rule was ruled out, a lot of work before hand and I think that is why there Housing Authority started with a true hold harmless policy with true ZIP Code based

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payment standards that was the take away point for me that they started the advocacy early and then went to great results when it was ruled out.

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>> Greats.

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NHLP had a working group at that time.

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Perhaps it's something we can reconsider for advocates working in the new mandatory areas.

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Just a way of sharing ideas, advocacy strategies and resources.

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Thanks Jeff. So Rachel, a question about the Philadelphia housing commission.

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Did they adopt a policy it did exist as an option in the small area, always been part of the will and the great advocacy of a lot of our organizations.

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Which I do get the whole promise policy required but HUD fell short of requiring it.

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So Rachel, do you want to talk a little bit until he had that hold harmless policy?

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>> That's a good question. I think we mainly saw the issue is when tenants were looking to move.

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I don't think it was so much an issue a tenant was already leased out and they were dropping the payment standard, I think it was if a tenant went to move that they were no longer able to rent at the same payment standard that they had been able to rent in the same neighborhood before.

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And so they were in a position where they had to choose to stay in a place that maybe has accessibility issues or do I move and struggle with that.

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>> I'm so glad you raise that point Rachel because it's an important one that we didn't cover which is what happens around existing tenants when that payment standards are changing.

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>> The advocacy we do now is a reverse of that problem.

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Which is that if we have tenants renting above that payment standards and eating that increase themselves than that payment standard increases, we try to get the Housing Authority to do an automatic increase to the payment standard not having to wait for the next regular recertification are waiting for the tenant to move.

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And that is a surprisingly hard ass.

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>> SPEAKER:That's really interesting because NHLP sent a tremendous amount of advocacy on this.

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We hope that we will see a policy change soon.

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Because of this new issue, that payment standards. Like rents are not giving up.

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They're not keeping up with rent increase.

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Because the landlords are consistently requesting increases or there's a change in payment standard between recertification's.

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So sordid to me as a example of how the voucher program has changed historically.

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Now they're just more increases in the tenants are always having to keep up.

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So that is a huge problem also that you've identified.

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And it is great to hear you're doing a lot of local advocacy to change the policy on that.

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But we would hope to see a broader advocacy nationwide on that. I will open this one up, maybe feel we can start with you.

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But there is a question about, this is another myth busting question around, it sounds like somebody was advocating with their PHA, and heard we are a PHA, and that encompasses a rule area.

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We don't want to adopt small area FMR's which means were trying to promote our tenants moving to higher costs more dense urban neighborhoods which is not what our tenants want.

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So I guess I will kick it off and others can feel free to chime in.

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To me this really goes at the importance of the hold harmless policy.

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Nobody has to move.

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Fundamental to the program, the voucher program is mobility, but it's also housing choice.

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Nobody should be forced to move if families want to stay in those rural areas and ID ideally they have a hold harmless policy and the tendency in stay without any harm even if the PHA adopts a small area FMR but others should feel free to chime in.

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On that one.

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Okay.

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We will leave that. So maybe folks, we have one more minute.

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So I will just ask this next question and then we will wrap it up.

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There is some really great questions here.

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It sounds like tenants moving into higher cost apartments, also than that comes along with extra amenities.

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And then tenants are really pushed into using these limited financial resources for things they may have not had to spend money on when they're on the lower rent higher poverty neighborhoods.

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Putting residents and tenant families at risk of eviction because those costs are not covered.

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Does anyone want to comment on that?

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Go ahead.

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>> This is really a question for you guys.

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Why on some of those costs part of the gross rent?

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Does HUD exclude all those aspects of rent?

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From their rent calculation?

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>> I would argue that some of those should be included in rent.

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Many of you participated in our jump if he comments recently or submitted your own. This was a big part of it right. A lot of this should be covered in the definition of rents.

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That being said, all of us that are representing voucher tenants, it's can sneak up on you later when the families been living there for two years and suddenly it's a way to increase the rent outside of the regulatory process.

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Potentially it might be considered an illegal side payment so this is a big question and these are all considerations that I think families are making upon moves and these are also positive policy questions. How do we support families move into higher opportunity neighborhoods. One way is to make sure they're not side payments in the not charging higher fees for voucher payments.

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They could be illegal.

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I think it's a good question and it raises a number of policy considerations as well.

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But I think that's also probably a good place to start. I would say my want to go away, I learned a lot, had a lot of takeaways but a big one is sort of going back to where we started which is the small area FMR is one way -- one response, one part of the solution to a really complicated systems challenge that we have with the current voucher program.

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We know that voucher program works.

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But we know is really hard for families to find housing with a voucher rhino let alone in this opportunity neighborhoods.

01:04:22.000 --> 01:04:28.000

There is a lot of other policies that Dr. tenants can benefit from going hand-in-hand with small area FMR's.

01:04:28.000 --> 01:04:38.000

But all of these working together to where we will see a really big impact.

01:04:38.000 --> 01:04:44.000

So I will leave it there. But I want to say you think you to all of our panelists today. To our moderator.

01:04:44.000 --> 01:04:46.000

Can you close us out.

01:04:46.000 --> 01:04:53.000

>> Yes, thanks everybody, thanks to the panelists for sharing your experiences.

01:04:53.000 --> 01:04:54.000

And after this webinar the participants you will receive an email, a follow-up email including the recording.

01:04:54.000 --> 01:04:59.000

Of the webinar.

01:04:59.000 --> 01:05:01.000

And the slides and some additional resources.

01:05:01.000 --> 01:05:06.000

Make you everyone for joining us.

01:05:06.000 --> 01:05:09.000

You're free to email us with any additional questions or if you need to follow-up.

01:05:09.000 --> 01:05:10.000

Thank you so much for joining.