Kerri Callais
Councilmember
at Large

Richard "Richie" Lewis
Councilmember
at Large

Gillis McCloskey
Councilmember
District A

Nathan Gorbaty
Councilmember
District B

Howard Luna
Councilmember
District C

Wanda Alcon
Councilmember
District D

Manuel "Monty" Montelongo III
Councilmember
District E

Roxanne Adams
Clerk of Council

#21

EXTRACT OF THE OFFICIAL PROCEEDINGS OF THE COUNCIL OF THE PARISH OF ST. BERNARD, STATE OF LOUISIANA, TAKEN AT A REGULAR MEETING HELD IN THE COUNCIL CHAMBERS OF THE ST. BERNARD PARISH GOVERNMENT COMPLEX, 8201 WEST JUDGE PEREZ DRIVE, CHALMETTE, LOUISIANA ON TUESDAY, MARCH 6, 2018 AT SEVEN O'CLOCK P.M.

On motion of Mr. Luna, seconded by Mr. Montelongo, it was moved to **adopt** the following resolution:

RESOLUTION SBPC #1810-03-18

A RESOLUTION TO APPROVE AND ADOPT THE REASONABLE RENT POLICY.

WHEREAS, The Department of Housing and Urban development (HUD) has established regulations that require the Agency to adopt a written Administrative Plan that established local policies of the program in accordance with HUD requirements; and

WHEREAS, 24CFR 982.54(d) 15 requires that the Agency Administrative Plan must cover PHA policies on the method of determining that rent to owner is a reasonable rent (initially and during the term of a HAP contract); and

WHEREAS, The Department of Housing and Urban development has established the Section 8 Management Assessment Program (SEMAP) regulations that requires the Agency to demonstrate to HUD that the Agency has and implements a reasonable written method to determine and documents for each unit leased that the rent to owner is reasonable [24CFR985.3 (b) (3) (a) & (B)], and

WHEREAS, It is the intent of the Board of Commissioners of the Agency to establish policy that will implement the rules and regulations provided by the Department of Housing and Urban Development with regard to management of a public housing agency

WHEREAS, This Agency has contracted, as part of the EZ-Reasonable Rent Determination System, to provide the Reasonable Rent Policy to be implemented by the Housing Authority staff.

NOW THEREFORE BE IT RESOLVED, that the Board of Commissioners hereby approves and adopts the Reasonable Rent Policy on the 6th day of March, 2018. The Policy will take effect immediately.

Kerri Callais
Councilmember
at Large

Richard "Richie" Lewis
Councilmember
at Large

Gillis McCloskey
Councilmember
District A

Nathan Gorbaty
Councilmember
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Councilmember
District E

Roxanne Adams
Clerk of Council

Page -2-
Extract #21 continued
March 6, 2018

     The above and foregoing having been submitted to a vote, the vote thereupon resulted as follows:

YEAS: McCloskey, Gorbaty, Luna, Alcon, Montelongo, Lewis

NAYS: None

ABSENT: None

The Council Chair, Ms. Callais, cast her vote as **YEA**.

And the motion was declared **adopted** on the 6th day of March, 2018.

CERTIFICATE

     I HEREBY CERTIFY that the above and foregoing is a true and correct copy of a motion adopted at a Regular Meeting of the Council of the Parish of St. Bernard, held at Chalmette, Louisiana, on Tuesday, March 6, 2018.

Witness my hand and the seal of the Parish of St. Bernard on the 6th day of March, 2018.
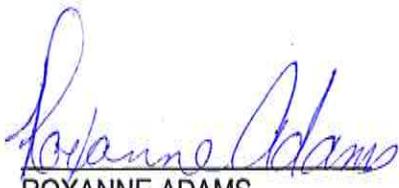
ROXANNE ADAMS
CLERK OF COUNCIL

St. Bernard Parish Government
Housing and Redevelopment
Housing Choice Voucher Program
8201 West Judge Perez Drive
Chalmette, Louisiana 70043
504-278-4468 (OFFICE)   504-266-2641 (FAX)
housing@sbpg.net

Board Resolution No: _____
Resolution to Approve and Adopt the
Reasonable Rent Policy

WHEREAS: The Department of Housing and Urban development (HUD) has established regulations that require the Agency to adopt a written Administrative Plan that established local policies of the program in accordance with HUD requirements; and

WHEREAS: 24CFR 982.54(d) 15 requires that the Agency Administrative Plan must cover PHA policies on the method of determining that rent to owner is a reasonable rent (initially and during the term of a HAP contract); and

WHEREAS: The Department of Housing and Urban development has established the Section 8 Management Assessment Program (SEMAP) regulations that requires the Agency to demonstrate to HUD that the Agency has and implements a reasonable written method to determine and documents for each unit leased that the rent to owner is reasonable [24CFR985.3 (b) (3) (a) & (B)], and

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WHEREAS: This Agency has contracted, as part of the EZ-Reasonable Rent Determination System, to provide the Reasonable Rent Policy to be implemented by the Housing Authority staff.

NOW THEREFORE BE IT RESOLVED that the Board of Commissioners hereby approves and adopts the Reasonable Rent Policy on _____day of _____, 2018. The Policy will take effect immediately.

X_____
Chairperson- Board of Commissioners

X_____
Secretary of the Board

Board Resolution No: _____
Resolution to Approve and Adopt the
Reasonable Rent Policy

WHEREAS: The Department of Housing and Urban development (HUD) has established regulations that require the Agency to adopt a written Administrative Plan that established local policies of the program in accordance with HUD requirements; and

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NOW THEREFORE BE IT RESOLVED that the Board of Commissioners hereby approves and adopts the Reasonable Rent Policy on _____day of _____, 2018. The Policy will take effect immediately.

X _____   X _____
Chairperson- Board of Commissioners   Secretary of the Board

This Reasonable Rent Policy and Procedures is to be added to the Section 8 Housing Choice Voucher Administrative Plan, and includes the following sections.

I.   Statement of Compliance with Reasonable Rent Regulations
Background

The EZ-Reasonable Rent Determination (EZ-RRD) system is utilized to assist staff to conduct reasonable rent analysis for units to be assisted. The EZ-RRD system was designed to correct long-standing misconceptions and problems about reasonable rent analysis. For example, other systems allow the Agency Analyst to select the comparable units, allowing for possible favoritism, subjectivity and Fair Housing Issues. EZ-RRD automatically selects the best comparable units in the database using consistent and objective methods. Thus, the Agency and U. S. Department of Housing and Urban Development (HUD) are protected from fraud, waste, and mismanagement.

In another example, some systems look for comparable units based only on the same or similar rents. They do not account for differences in the characteristics between the assisted and comparable units. The EZ-RRD system uses the standard deviation method to enable proper comparisons of the unit to be assisted and comparable units with different characteristics, assuring the Agency that an "apples-to-apples" comparison is made.

Agency should always ensure the EZ-RRD database has an adequate number of current comparable units in all communities in which the Participants live as well as communities that may provide Expanded Housing Opportunities. Expanded Housing Opportunities is a HUD term that indicates a geographic area that may offer better housing quality, good public transportation, good schools, close proximity to jobs and services, etc.

This Policy represents a reasonable method per the Section 8 Housing Choice Voucher and SEMAP regulations, as well as the HUD Housing Choice Voucher Program Guidebook. It also represents a common-sense approach according to the HUD SEMAP Confirmatory Review and Reasonable Rent Quality Assurance protocols.

Timing
A unit will not be approved until it is determined that the requested rent by the owner/agent is a reasonable rent. The Agency will also determine the reasonable rent before approving any increase in the rent or if there is a five percent (5%) decrease in the published FMR sixty (60) days before the contract anniversary as compared with the FMR in effect one year before the contract anniversary, or if directed by HUD. The agency may elect to re-determine reasonable rent at any other time.

Compliance with 24 CFR Section 982.507 Rent to Owner: Reasonable Rent and 24 CFR Section 985.3 (b) Reasonable Rent.
The regulations do not require a specific method to be utilized. The only requirements for comparability at 24 CFR 982.507 (b) is for the Agency to utilize unassisted units as comparable units and to consider all nine characteristics for each determination. Therefore, the reasonable rent system uses only unassisted units for comparable units. It also considers the following characteristics for each determination.

- Location
- Quality
- Size (by # of bedrooms, overall size and # of bathrooms)
- Unit type
- Age of the contract unit
- Amenities
- Housing services
- Maintenance
- Utilities to be provided by the owner

The only requirements for reasonable rent at 24 CFR 985.3 (b) is for the Agency to have and implement a reasonable written method that uses all nine of the above characteristics. This Policy describes the reasonable method herein.

The EZ-Reasonable Rent Determination (EZ-RRD) Report documents implementation of this Policy. This Policy includes an example of this Report.

II. Step-by Step Explanation of Procedures
This section first explains the preparation needed to perform reasonable rent determinations; then it provides the steps to implement the reasonable rent determinations.

Preparation: Use of Location
The first step in preparation concerns the location characteristic. Location has the greatest impact on rent. Therefore, this system gives the greatest weight to location.

To define location, the EZ-RRD Analysts divide the Agency's jurisdiction into three rental market value areas. Each unit to be assisted and each comparable unit is assigned to be in either a high, medium, or low rental market value location. Section III of this Policy provides an explanation of how these rental market values are determined.

Preparation: Assigning Maximum Value Points to HUD Required Characteristics
EZ-RRD assigns maximum value points to each HUD required characteristic. These value points represent the economic value for each characteristic. Section III of this Policy provides an explanation of how the value points are determined.

Value Point Levels Applied to Each Characteristic
Each characteristic is assigned a value point level. Characteristics with higher levels have more impact on the actual rent. Level V has the highest number of potential value points. Level I have the lowest number of potential points.

Each level has a value point range. The actual number of value points assigned to a characteristic is determined by the description of each characteristic in a particular unit. For example, for the quality characteristic, a unit with high quality will receive more value points than a unit with fair quality. The table below provides value levels and point ranges.

Characteristic	Value Point Level	Value Point Range
Location	V	15-23
HQS Quality	IV	10-18
Utilities Provided by Owner	IV	0-18
Building Structure (Unit Type)	IV	10-18
Overall Unit Size	III	8-13
Number of Bedrooms	II	4-9
Number of Bathrooms	II	4-9
Age	II	4-9
Amenities	II	0-9
Maintenance	I	1-5
Housing Services	I	0-5

Implementation
Below are step-by-step procedures for performing each reasonable rent determination. These procedures include data entry into the web-based EZ-RRD system and analysis performed by the system.

1.   After the Agency Analyst enters the address for the Unit to be Assisted, EZ-RRD provides the Agency Analyst with the option to select the best comparable units by filtering.

If the Agency does not filter, EZ-RRD will select the best comparable units from the database for the Agency's entire jurisdiction. If the Agency does not find it necessary to filter, the Agency Analyst skips this option.

However, some agencies may have large jurisdictions that are comprised of smaller geographic areas that have significantly different rental market values. These agencies may wish to filter to select the best comparable units only from within a specific smaller geographical area.

If filtering is utilized, a two-step process is required. First, the Agency Analyst selects the Filter Type from a drop-down menu. The Filter Type may be city, state, zip code, census tract, real estate code, neighborhood, custom 1 and custom 2. After selecting the filter type, the Agency Analyst mouse-clicks in the *Filter To* field. EZ-RRD displays all the filtering options within the selected type. The Agency Analyst then selects the desired option. For example, some agencies may be comprised of several cities with significant rental market value differences. When the Agency Analyst selects filtering by city, all cities with comparable units will be displayed. The Agency Analyst then selects the desired city.

2.   The Agency Analyst enters an accurate description of the unit to be assisted for each required characteristic. The Agency is responsible for accurate data input for each characteristic for the unit to be assisted. The Agency is responsible to confirm the accuracy of the data provided by the Landlord for the required characteristics. To ensure that accurate descriptions are entered the definitions for each description are provided on the system under "Help Me Decide" for each characteristic. In addition, these definitions are provided on a laminated guide called EZ-RRD Rent Reasonableness Determination Steps. It is provided in the detailed Reasonable Rent User's Manual that is provided separate from this Policy.

3.   Based on the descriptions entered into the EZ-RRD system, it assigns the appropriate values to each characteristic for the unit to be assisted.

4.   EZ-RRD system totals the values of each characteristic for the unit to be assisted to obtain the unit's Total Value Points.

5.   EZ-RRD system analyzes the Total Value Points and descriptions of all characteristics for both the unit to be assisted and the comparable unit database. It locates units with exact points and characteristics to use as comparable units.

6.   If there is no exact match, EZ-RRD system will next select comparables based on the database search priorities listed on the following chart.

Database Search Priorities Chart

Priority #	Action
I	Exact match on all 9 required characteristics and total value points
II	Exact match to structure type, location, # of bedrooms, and same or similar total value points for all required characteristics
III	Exact match to location, # of bedrooms, and same or similar total value points for all required characteristics

Through the above database search process, the three comparable units most similar to the unit to be assisted are selected.

7. EZ-RRD system then populates the Reasonable Rent Determination Report (hereafter called Report) with the characteristic descriptions and total value points for the unit to be assisted and each of the three comparables. See sample Report below.

8. The EZ-RRD System analyzes the data for the Average Rents of Comparables, Average Value of Comparables, Unit to be Assisted Rent and Unit to be Assisted Value factors. Based on this analysis, EZ-RRD calculates the estimated reasonable market rent for the unit to be assisted. On the EZ-Reasonable Rent Determination Report, this figure is called the Recommended Reasonable Rent.

9. On the top of the Report, EZ-RRD displays the following analysis data:
   a. Average Rents of Comparables
   b. Average Value of Comparables
   c. Unit to be Assisted Rent
   d. Unit to be Assisted Value
   e. Recommended Reasonable Rent

10. The Agency Analyst reviews the five factors listed in the analysis data mentioned above. Based on this review, the Agency Analyst makes the final decision concerning reasonable rent. The Agency Analyst compares the Recommended Reasonable Rent figure with the Unit to be Assisted rent figure. Generally, if the Recommended Reasonable Rent figure is equal to or higher than the Unit to be Assisted rent, the Agency Analyst may determine the requested rent to be reasonable. The Agency Analyst may then select "Yes" on the Report, print it, and secure it in the tenant file. EZ-RRD will automatically fill in the Analyst's name and date of the determination.

Generally, if the Recommended Reasonable Rent figure is less than the Unit to Be Assisted rent, the Agency Analyst may determine the rent is not reasonable. The Agency Analyst may then select "No" on the Report, print it, and secure it in the tenant file. EZ-RRD will automatically fill in the Analyst's name and date of the determination.

If a Request for a Reasonable Accommodation is made, see Section IV – Compliance with Fair Housing Regulations in this Policy.

Sample Reasonable Rent Determination Report
A sample Reasonable Rent Determination Report is provided below. The Value Point level and the actual value assigned to each characteristic in this sample are also provided.

As needed an optional Reasonable Rent Determination Standard Deviation Adjusted Report showing standard deviation comparisons may be used. This optional report illustrates the results of standard deviation calculations for the characteristics of unit size, unit type, quality, and age if needed.

For illustration purposes only Red lettering does not appear on system-generated reports. Used here to illustrate values assigned.

EZ-Reasonable Rent Determination Report

Analysis Data:

Average Rent of Comparables:	$1,289.67
Average Value of Comparables:	47
Unit To Be Assisted Rent:	$900.00
Unit To Be Assisted Value:	47

Recommended Reasonable Rent:	$1,289.67
The analysis of the above data shows the requested rent for the unit to be assisted to be reasonable?	Yes
If YES above, the Requested Rent is reasonable.	

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Fort Worth, Texas
(817) 922-9000
www.nelrod.com

11/16/2015

Staff Person Name   Date

Unit To Be Assisted	Comp 1	Comp 2	Comp 3
Address	Address	Address	Address
123 Test Avenue Any City, TX *****	4232 Crumley Way Anytown, TX 95843	9361 Amethyst Way Anytown, TX 95624	918 Terrace Lane Anytown, TX 95632
User Defined	Census Tract 74.06	Census Tract 93.08	Census Tract 95.03
Location ** Low Rent Area Level V-15	Location ** Low Rent Area Level V-15	Location ** Low Rent Area Level V-15	Location ** Low Rent Area Level V-15
Unit Size ** Medium Level III-8	Unit Size ** Medium Level III-8	Unit Size ** Medium Level III-8	Unit Size ** Medium Level III-8
Unit Type ** Single Family Level IV-15	Unit Type ** Single Family Level IV-18	Unit Type ** Single Family Level IV-15	Unit Type ** Single Family Level IV-16
Quality ** Fair Level IV-14	Quality ** Good Level IV-14	Quality ** Good Level IV-12	Quality ** Good Level IV-14
Age ** 21-50 Years Level II-6	Age ** 6-20 Years Level II-6	Age ** 50+ Years Level II-6	Age ** 6-20 Years Level II-4
Amenities ** Cable/internet ready, Covered and/or Off-street Parking, Hardwood Floors, Range, Refrigerator, Washer/Dryer Hookups Level II - 0	Amenities ** Cable/internet ready, Carpeting, Central A/C Unit, Covered and/or Off-street Parking, Dishwasher, Washer/Dryer Hookups, Other: Garage Level II-4	Amenities ** Cable/internet ready, Ceiling Fan, Central A/C Unit, Covered and/or Off-street Parking, Dishwasher, Garbage Disposal, Laundry Facilities, Range, Washer/Dryer Hookups, Working Fireplace, Other: Garage Level II-3	Amenities ** Cable/internet ready, Carpeting, Central A/C Unit, Covered and/or Off-street Parking, Dishwasher, Range, Washer/Dryer Hookups, Other: Garage Level II-3
Housing Services ** No Services Level I-5	Housing Services ** No Services Level I-0	Housing Services ** No Services Level I-0	Housing Services ** No Services Level I-0
Maintenance ** Level I-5 Owner Provides Offsite Maintenance	Maintenance ** Level I-2 Owner Provides Offsite Maintenance	Maintenance ** Level I-2 Owner Provides Offsite Maintenance	Maintenance ** Level I-2 Owner Provides Offsite Maintenance
Paid Utilities ** Level IV-0 Sewer, Trash Collection, Water	Paid Utilities ** Level IV-0 None	Paid Utilities ** Level IV-6 None	Paid Utilities ** Level IV-6 None
Bedrooms Level II-6 3 Bedrooms	Bedrooms Level II-6 3 Bedrooms	Bedrooms Level II-6 3 Bedrooms	Bedrooms Level II-6 3 Bedrooms
Bathrooms ** Level II-4 1 Bathroom	Bathrooms ** Level II-4 2 Bathrooms	Bathrooms ** Level II-5 2 Bathrooms	Bathrooms ** Level II-4 2 Bathrooms
Requested Rent $900.00	COL Rent $1,327.00	COL Rent $1,268.00	COL Rent $1,274.00
Value 47	Value 47	Value 47	Value 47
Date of Data 11/16/2015	Date of Data 10/01/2015	Date of Data 10/01/2015	Date of Data 08/01/2015

Although the EZ-Reasonable Rent Determination system is an aid to provide data and analysis, the Agency is solely responsible for the reasonable rent determination herein.
** Required in accordance with 24CFR§985.3(b)(3)(A)

III.   Explanation of Types of Analysis used in the Procedures

The EZ-RRD system uses three basic methods of analysis. They are determining high, medium, and low Rental Market Value Areas, Assigning Value Points to Characteristics, and Standard Deviation calculation.

Determining High, Medium, and Low Rental Market Value Areas

High, medium, and low rental areas, or submarkets within the Agency's jurisdiction, are determined through a process called Value of the Unit's Location. EZ-RRD Analysts perform extensive economic research. This research identifies the value of rental property in all areas of the Agency's jurisdiction. This research entails examining many factors that affect property values and rental values within each submarket. These factors include but are not limited to census tract income levels, percent of population above or below poverty, median family income, renter occupied units, owner occupied units, percent of vacant units, median house age, crime statistics, public transportation, population impaction, community parks and other amenities, hospitals, airports, recreational facilities, waterfront access, recent real estate developments, etc.

These factors are used to evaluate the comparable unit or the unit to be assisted as well as the immediate three to four block area surrounding each comparable unit and unit to be assisted to assign a high, medium, or low rental market value rating to each comparable unit and each unit to be assisted.

The high rental market value area consists of luxury communities in the most favorable locations. These communities are usually newer construction and may have additional community/association amenities such as recreational facilities or be on a waterfront. Individual properties may include state-of-the-art systems, modern appliances, and/or superior quality finishes.

A medium rental market value area is considered an average neighborhood or intermediate community. These areas are slightly less favorable than the luxury areas. These communities may include newer, larger homes and may include quality finishes. These areas may have additional amenities such as a fitness center, swimming pool, and recreational courts. Properties would contain adequate systems and appliances.

The lower rental market value area is a below average neighborhood, ranging from minimal to depleted or impoverished areas. Minimal communities often include older, smaller homes in good condition (that would be considered starter homes if being purchased). They may also include buildings in poor condition that have been abandoned or vandalized. These neighborhoods may have community parks and swimming pools.

Assigning Value Points to Characteristics

The value for each characteristic is based upon the economic research for the Agency's jurisdiction described above. In addition, it is based on several years of

rental market research using an enormous, national, unassisted rental market unit sampling. Each HUD required characteristic was individually analyzed to represent its contribution accurately to the unit's total rental value. The specific values used are proprietary and cannot be disclosed.

For example, the Agency gives the highest weight to location. Higher weights are also given to utilities paid for by the landlord, quality, and unit type. The lowest values are given to maintenance and services.

The value points for each characteristic are added for each unit to become the Total Value Point rating. This rating represents the unit's actual rental value. The Total Value Points for the unit to be assisted are compared with the Average Total Value Points for the three comparable units during the reasonable rent determination process. This process is illustrated on the sample Reasonable Rent Report provided above.

This methodology is also supported by the Housing Choice Voucher Program HUD Guidebook. This Guidebook refers to the Point and Dollars per Feature System.

Standard Deviation Calculations

The EZ-RRD system uses the standard deviation procedure to compare differing characteristics between the unit to be assisted and the comparable units. Standard Deviation uses the value points assigned to each characteristic to calculate the appropriate rent for units having different characteristics. The following examples illustrate how the EZ- RRD system applies the standard deviation calculation.

1. The high-quality characteristic has a value of 16 points. The fair quality characteristic has a value of 13 points, a 19% difference (16 - 13 = 3 point difference; 3 points ÷ 16 points = 19%). If the other characteristics are the same and if the high-quality unit rents for $1,000, the fair quality unit should rent at $810.00 or 19% less.

2. The single-family structure type characteristic has a value of 18 points. The garden/walkup structure type characteristic receives 15 points or 17% less. If the other characteristics are the same, and the single-family unit rents for $1,200.00, the garden/walkup unit should rent for $996.00, or 17% less.

The above calculation is made for each characteristic with different descriptions during each reasonable rent determination. The results of these standard deviation calculations are presented in the Total Value Points. For example, using the sample Reasonable Rent Determination above, the following Total Value Points and rents were listed:

Average Total Value Points of Comparables: 78
Average Rents of Comparables: $738.00

Total Value Points of Assisted Unit:	78
Requested Rent of Assisted Unit	$925.00

After applying the standard deviation calculations, this system determined that the average comparable units and the unit to be assisted had the same total value. As the requested rent for the unit to be assisted unit is higher than the average of the comparable units, the requested rent is not reasonable.

This method is described in the HUD HCVP Guidebook, pages 9 to 10. It states the Analyst may need to review the database for (a) same number of bedrooms and building type but in a broader geographic location or (b) have the same number of bedrooms, are in the same geographic location, but are in other types of buildings. In addition, the HUD HCVP Guidebook provides the following example:

The proposed program unit is located in geographic Area A, has three bedrooms, and is a garden apartment. The proposed rent is $1,220.00. There are no other garden apartments in Area A in the database. If there are other garden apartments in Area A, the analyst might try to obtain information about them. However, if there are no other garden apartments in Area A, then the analyst might look at 3 bedroom single family homes in Area A and compare them with information on both garden apartments and single family homes in nearby Area B. The information found (all rents are gross rents) is:

Unit	Area A	Area B
3-bedroom garden apartment	(None)	$1,400.00
3 bedroom single family home	$1,400.00	$1,600.00

The single family homes in Area B (that are similar to those in the database for Area A) are about 14 percent higher than garden apartments in Area B. If one estimates a rent for a garden apartment in Area A is 14 percent below that of the single family homes in Area A the result is $1,228.00. Assuming the other factors for comparison are generally equal, this should provide one indication that the proposed rent is comparable.

IV.   Compliance with Fair Housing Regulations

The Agency will ensure the reasonable rent determination process is not utilized to violate anyone's fair housing rights.   To accommodate a request for a reasonable accommodation, the Agency recognizes the Fair Housing regulations are more strict than the reasonable rent regulations.   Therefore, the fair housing regulations will take precedence.

A participant may make a request for a reasonable accommodation when the EZ-RRD Report shows the rent is not reasonable or when the rent is so high the Participant would pay more than 40% of their monthly adjusted income toward the rent (24 CFR Part 982.508 – Maximum Family Share at Initial Occupancy).   The Agency will take reasonable internal and external administrative remedies to grant regulatorily acceptable requests for a reasonable accommodation when said requests are received.

Internal administrative remedies are efforts completely within the Agency's control. As needed, the internal administrative remedies described below will be considered.

As a reasonable accommodation, the Agency may give a higher rating to four of the required reasonable rent characteristics as described below.   These higher ratings may result in a higher total value of the unit to be assisted, and thus enables the EZ-RRD software to identify comparable units that may justify a higher rent.

Concerning the location characteristic, the staff should review the definitions for the rental market value area to be sure the most accurate rental market value area is being considered for the unit to be assisted.

Concerning the quality characteristic, the Agency may give a unit with features that address a specific disability an "Excellent" quality rating.

Concerning the amenities characteristic, the actual features that address a disability are considered amenities.   The Agency may select the "Handicap Accessible" amenity and add one additional amenity in "Other."

Concerning the landlord provided services characteristic, if the unit has services that aid people with disabilities, such as transportation, extra security, meals and package handling, the Agency can select "Landlord Provided Services."

When the request for a reasonable accommodation concerns the 40% of the Monthly Adjusted Income (MAI) rule, the Agency may consider the internal administrative remedy of using a payment standard of 120% of the Fair Market Rent for the specific unit and participant in question (24 CFR 982.503 b. (1.) (v.).   The Agency does not need HUD approval for this action.   The higher payment standard may bring the tenant's rent share to under 40% of MAI thus allowing the Agency to approve the requested rent.

External administrative remedies involve efforts by the Agency and HUD. If the requested gross rent for a unit at initial occupancy exceeds the payment standard, and the tenant would pay more than 40% of their monthly adjusted income for rent, the Agency may request a waiver from HUD for the regulation at 24 CFR Part 982.508 – Maximum Family Share at Initial Occupancy. The waiver request would be to allow the family to pay more than 40% of their monthly adjusted income for rent.

As needed, another external administrative remedy the Agency will consider is to request a waiver from HUD from the regulation at 24 CFR Part 982.507 Rent to Owner's Reasonable Rent. This waiver request would be to approve the rent for the unit in question even though it is not reasonable. (This section subject to change if cited regulations are changed or updated.)

V. Agency Staff Training

As new analysts and new supervisors are appointed, they will undergo training concerning the reasonable rent requirements and the EZ-RRD system. This training will include a review of:

- 24 CFR Section 982.507 Rent to Owner: Reasonable Rent
- 24 CFR Section 985.3 (b) Reasonable Rent
- HUD Housing Choice Voucher Program Guidebook Chapter 9
- Reasonable Rent Policy
- EZ-RRD Procedures

The Analyst performing reasonable rent determinations will demonstrate proficiency for correctly performing the reasonable rent determination.

VI. Agency Interaction with Landlords

Owner/Agent Relations

The owner/agent will be advised by accepting each monthly housing assistant payment he/she will be certifying that:

- The Rent to Owner is not more than rent charged by the owner/agent for comparable unassisted units in the premises.
- The assisted family is currently occupying the unit and the assisted family is not in violation of lease obligations.

Owner/Agency Negotiations

If owners object to the approved rent, they may submit all HUD required comparable data for at least three unassisted units. The data will be confirmed by the Agency and added to the existing comparable units database. The Agency will then run a new determination.

VII. Agency-Owned Units

Local government or independent entities (approved by HUD) must perform rent reasonableness determinations for Agency owned units leased by voucher holders. In these cases, the following arrangements may be made:

- The Authority may pay expenses associated with this service.
- The Authority may use administrative fee income to compensate the independent agencies for their services.
- The family cannot be charged for these services.

VIII. Collection of Unassisted Comparable Units

Data for comparable units may be collected from the following sources:

- Onsite visits
- Real estate, Landlord/real estate investor groups, property managers
- Any publication with real estate ads
- Available Census Reports for the most recent years
- Various Internet sources
- Multiple Listing Service
- Newspaper ads followed by owner/agent interviews
- Owner/agent questionnaires
- Apartment and home rental guides
- Fair Housing groups
- Government sources
- Other method

IX. Calculation of the Recommended Reasonable Rent

The EZ-RRD System automatically calculates the Recommended Reasonable Rent figure and prints that figure on the EZ-Reasonable Rent Determination Report (RRD). The Recommended Rent figure is determined through two automated calculations. First, The Average Rents of Comparables is divided by the Average Value of Comparables to obtain the average dollar value per value point of the comparable units. Second, this average dollar values is multiplied by the unit to be assisted value points to obtain the recommended rent.

The staff person performing the RRD compares the Recommended Reasonable Rent figure with the Unit to be Assisted Rent figure. If the recommended rent is equal or higher than the unit to be assisted rent, the requested rent is reasonable. The staff person marks "YES" on the RRD.

If the Recommended Rent is lower than the Unit to be Assisted rent, the request rent is not reasonable. The staff checks "NO" on the RRD and follows the process for unreasonable rent requests.

User Guide

EZ-REASONABLE RENT DETERMINATION
A Web Based Service of the Nelrod Company
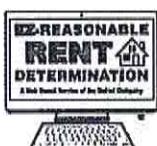
3109 Lubbock Avenue
Fort Worth, Texas 76109
817-922-9000/Fax 817-922-9100

User Guide

Table of Contents

EZ-Reasonable Rent Determination Procedures Notes

The Recommended Reasonable Rent Determination Procedures are on the next page. The following are some important notes concerning these procedures:

- The procedures are written to provide each user with adequate freedom to accomplish the task, while still maintaining consistency of the system.
- The procedures are in compliance with the policy and HUD requirements.
- Pursuant to SEMAP the documentation clearly shows the procedures were followed.
- Remember to print the Reasonable Rent Determination form, sign the form if it is not auto filled with staff person's name, and secure it in the tenant's file.
- If the Reasonable Rent Determination form is misplaced, a copy can be printed by using the Archive function.

EZ-Reasonable Rent Determination Procedures Overview

Preparation

1. Set up computer with Internet access, display settings at 1024 x 768, printer, and computer mouse. Connect to the Internet through your Internet provider. Type in website address http://www.ezrrd.com/login in the address drop down field and click the Go button.
2. Next, enter your unique User ID. (Tab key)
3. Enter your password and hit enter key or the *Sign in* button.

Perform Reasonable Rent Determination

Enter unit to be assisted information and receive a rent determination report.

Reasonable Rent Determination

It is the agency staff person's responsibility to make the final reasonable rent determination using data supplied on the EZ-RRD Determination Report. This task is completed by comparing the *Recommend Reasonable Rent* amount to the Unit to be Assisted rent.

Login/logout

1. Set up computer with Internet access, display settings at 1024 x 768, printer, and computer mouse. Connect to the Internet through your Internet provider. Type in the website address http://www.ezrrd.com/login in the address drop down field then enter key.
2. Next, enter your unique User ID.
3. Enter your password.
4. Click the *Sign in* button.
5. To *Log Out* choose the middle button (with arrow) from the drop down menu located at the top right.

EZ-Reasonable Rent Determination now accommodates multiple level users. The access and privileges are listed below.

- Archive Only – Able to print existing **RRD** reports only.
- Entry Only User– **Perform RRD, Enter New Comparables Unit Surveys.**
- Standard User – Same privileges as Entry Only plus **Search RRD Archive, Search Units to be Assisted, View/Edit Surveys, Survey Summary Report.**
- Power User - Same as Standard User plus copy and delete function.
- Agency Admin User – Same as Power User plus ability to setup/remove agency staff users and access EZ-RRD *Reports.*

Unit to be Assisted RRDs– Perform RRD

Below are general data entry instructions for the Nelrod Company's EZ-Reasonable Rent Determination (EZ-RRD) System *Perform RRD* function. Note: this screen is the default screen after system login.

This screen's location is in a submenu listed under the *Unit to be Assisted RRDs* Menu located in the black left area of the screen.

Overview of Data Entry

- Red coded data entry fields are HUD required and must be completed.
- When entering appropriate information in the data entry field, use the *Tab* key to move to the next data entry field instead of the *Enter* key. Using the *Enter* key will cause multiple system errors. If this should happen simply complete the highlighted error fields.
- Once all required fields have been completed, mouse click the *Perform Rent Determination* button.

Help Me Decide Buttons

If you are unsure which choice to select, mouse click the *Help Me Decide* button located directly beneath the required field. Clicking this button will cause related definitions for the field selections to be displayed.

Perform RRD - Data Entry Instructions

1	Report showing standard deviation methodology applied	System default is No. If you prefer the Standard Deviation Adjusted Report select Yes.
	Tenant Name	Optional. Enter name of tenant.
	User Defined	Optional. Agency staff defined field used to store additional data such as inspection report number, tenant number, etc. Text only field. Not sortable.
	Street Address	Complete street address including apartment number if applicable.
	City/State/Zip	Complete all fields.
	OPTIONAL: You can select one of the following filters to narrow your search	Please note the OPTIONAL Filters should only be used if system filtering is necessary. Applying system filters limits the comparables selection from the entire comparables database to a smaller targeted selection only.
	Filter Type:	Select one Filter Type from the drop down menu. Next select a Filter To: to complete the filtering process.
	Filter To: City	Choose city if your agency's database includes more than one.
	Filter To: State	Select state if your agency's database includes more than one state.
	Filter To: Zip code	Select zip code if your agency's database includes more than one zip.
	Filter To: Census Tract	Select census tract if your agency's database includes more than one census tract. Most comparables databases are not designed to be filtered by census tract therefore you may or may not receive an analysis report.
	Filter To: Real Estate Code, Neighborhood, Custom 1 and Custom 2	These fields are used for customized selections only. The data contained in these fields is determined by Nelrod staff and should only be used if agency staff are instructed to apply these filters.

2	Dwelling Type	Select One: • **Single Family** – one family unit. • **Duplex** – two units in one building with at least one unit being on one floor; can be side to side or up and down. • **Townhouse** – two or more attached units with each having two or more floors. • **Row House** – a dwelling unit within a line of dwelling units attached at the side or rear by common walls. Unit is on one floor. • **Manufactured home/mobile homes** – a house assembled in a factory. • **Garden/Walkup Apartment/Multifamily** – building has 2-4 stories and unit is on one floor. • **High Rise** – building with 5+ stories and the unit is on one floor.
3	Unit Condition	Select one: • **Excellent** – Quality greatly exceeds HQS, includes many upgrades, usually new construction or recent renovation of at least 60% of unit. • **Good** – Quality meets/exceeds HQS and includes multiple upgrades. • **Fair** – _Average quality unit._ Quality meets/barely meets HQS or minimum repairs needed to meet HQS. • **Poor** – Substandard quality. Many major repairs needed to meet HQS.
4	Unit Size	Select one: • Large • Medium • Small Please refer to square footage below for recommendations. Square footage. Optional field.

Efficiency	Square Footage	One Bedroom	Square Footage	Two Bedroom	Square Footage	Three Bedroom	Square Footage
Small	0-450	Small	0-500	Small	0-650	Small	0-1000
Medium	451-600	Medium	501-750	Medium	651-950	Medium	1001-1500
Large	601+	Large	751+	Large	951+	Large	1501+
Four Bedroom	Square Footage	Five Bedroom	Square Footage	Six Bedroom	Square Footage	Seven Bedroom	Square Footage
Small	0-1300	Small	0-1500	Small	0-1650	Small	0-1700
Medium	1301-1850	Medium	1501-1950	Medium	1651-2050	Medium	1701-2100
Large	1851+	Large	1951+	Large	2051+	Large	2101+

5	Bedrooms	Select number of bedrooms.
6	Bathrooms	Select number of bathrooms.
7	Unit Age	Select unit age. Year Built. Optional field.
8	Owner Provided Amenities	Select all that apply to unit and/or property. Notes: • Hardwood Floors includes wood and upgraded laminate. • If washer/dryer is shared select Laundry Facilities only. • If washer/dryer in is in individual unit select Laundry Facilities and Washer/Dryer Hookups. • Covered and/or Off-street parking includes a parking lot, parking pad, driveway and/or carport. • Modern appliances select if any appliance is 0-5 years old. • Energy Efficient Cert Units refers to appliances or property. • Yard Sprinkler System does not apply to a multi-family unit. • Security System includes intercom system. • Handicap Accessible includes the unit and/or property. • Working Fireplace. Gas or wood burning only. • Central A/C Unit includes evaporative and refrigerated units. • Other Amenities. Add one additional amenity that increases the unit's rent such as a view, waterfront, acreage, ceramic tile floors, etc.

9	Location	Select one:
		• **Very High Rent Area** Designated location for agencies that HUD has required additional luxury neighborhoods be included in comparables selection. • **High** (Above average) Luxury communities in the most favorable locations. These communities are usually newer construction that may have additional community/association amenities such as recreational facilities or be on a waterfront. Individual properties would include state-of-the art systems, modern appliances, and/or superior quality finishes. • **Medium** (Average) Intermediate communities. These communities include newer, larger homes that may include quality finishes. These communities might have additional community/association amenities such as fitness center, swimming pool, and recreational courts. Properties would include adequate systems and appliances • **Low** (Below average) Minimal, depleted or impoverished communities. Minimal communities often include older, smaller homes in good condition and that are usually the first home that a person/family can afford to purchase (starter- homes). These neighborhoods may include community amenities such as a community park or swimming pool. Depleted or impoverished communities may include much older communities where there is a disproportionately large amount of crime. These communities may include homes that are in bad physical condition, have been abandoned or vandalized.
10	Utilities to be provided by Owner	Select all utilities that are included in the request rent.
11	Monthly Rent	Enter requested rent. Enter whole number only.
12	HAP Rent	Optional field.
13	Date HAP Signed	Optional field.

14	Housing Services	Select one. Some examples of services are: • Package receiving for tenants. • Cable and/or internet included in rent. • Pest control. • Courtesy patrol. • 24 hour maintenance. • Lawn care/snow removal (does not include multi-family).
15	Maintenance	Select one. • Onsite maintenance includes assigned or onsite. • Offsite maintenance – has to be performed by professional. • Poor maintenance includes performance by non-professionals and tenant responsible for any routine maintenance costs.

After the Unit to be Assisted information has been entered, mouse click the blue box located at the bottom right of the screen labeled *Perform Rent Determination*. If all HUD required fields we completed you will receive the analysis Report. If all fields were not completed a pop-up message will notify you of the missing fields. Please complete these fields and click the *Perform Rent Determination* button again to complete the analysis process. Once you receive the analysis Report, determine if the requested rent is reasonable, select yes or no, print the report and place a copy in the appropriate files.

Unit to be Assisted RRDs –
Search RRD Archive

This screen displays all the archived RRD Reports for your agency.

It is also possible to target individual reports by address or user. To target reports:

- Select date range.
- Enter address and/or select user.
- Mouse click *Apply Filters* button.

The targeted reports data will be displayed below *Results*. You may also export the data displayed to an Excel spreadsheet.

Unit to be Assisted RRDs–
Search Units to be Assisted

EZ-RRD stores all Unit to be Assisted data for easy retrieval. To retrieve data for an individual unit select the date range, enter address and mouse click the *Apply Filters* button. EZ-RRD will display all applicable reports for the unit. The displayed data can be edited, copied, or deleted.

Comparable Unit Surveys–
Enter New

Agency staff have the option to enter unassisted rental maket comparables data into the EZ-RRD comparables database that will be used for analysis selection. Please refer to pages 4-8 of this guide for data entry instructions.

Comparable Unit Surveys-
View/Edit

All existing comparables data for your agency is displayed on this screen. Please note all comparables data can be edited, copied and deleted by agency staff.

If you would like to target specific comparables data select a date range, enter the address and mouse click the *Apply Filters* button. All applicable units will be displayed beneath *Results*.

Comparable Unit Surveys-
Survey Summary Report

To display existing comparables data by bedroom size and entry date select a date range, enter address, and mouse click the *Apply Filters* button. All applicable units will be displayed beneath *Results*.

Account Management

Add Users

Select *Account Management* from the Menu located in the black left area of the screen. Mouse click *Add New User*. Assign Login ID, Password, Access Level, Status, First name, Last name, Email and Autofill name. If you would like EZ-RRD to print the staff person's name on the RRD Reports change the system default from No to Yes. Mouse click *Create User* button to add the new user.

Access Levels

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- Entry Only User– **Perform RRD, Enter New Comparables Unit Surveys.**
- Standard User – Same privileges as Entry Only plus **Search RRD Archive, Search Units to be Assisted, View/Edit Surveys, Survey Summary Report.**
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Edit Users

Select *Account Management* from the Menu located in the black left area of the screen. Mouse click staff person's name from the *Users* listing. Complete edits and mouse click *Update User* button.

Reports

To view available EZ-RRD reports select *Reports* from the drop down Menu located in the black left area of the screen and then select the individual reports from the submenu.

To display report results select date parameters and then mouse click *Apply Filters* button.

Available Reports

- 🖥 **Current Leasing Report**- listing of number of units to be assisted and total HAP dollars by month. Report can be emailed to Agency designee.
- 🖥 **Detailed Current Leasing Status**- individual listing of number of units to be assisted by effective date, address and HAP dollars by month. Report can be emailed to Agency designee. Report can be emailed to Agency designee.
- 🖥 **Unit Turnover Report**- listing of units to be assisted removed from program and month removed. . Report can be emailed to Agency designee.
- 🖥 **Admin Comp Report** – listing of all market comparables in your secured database arranged by bedroom size. Report includes comparables by *Address, City, State, Quality, Location, Paid Utilities, Unit Type, Value,* and *Rent.* Report can be emailed to Agency designee.
- 🖥 **18-Month Activity** – monthly listing of determination report requests for the 18 months.
- 🖥 **Export Surveys to Excel** – export existing comparables data to Excel spreadsheet. This data can be stored on agency's computers.