

City of San Antonio



AGENDA Mayor's Task Force on Preserving Dynamic and Diverse Neighborhoods

Friday, January 16, 2015

2:00 PM

Media Briefing Room

A MEETING OF THE MAYOR'S TASK FORCE ON PRESERVING DYNAMIC AND DIVERSE NEIGHBORHOODS WILL BE HELD AT THE CITY HALL, MEDIA BRIEFING ROOM, 100 MILITARY PLAZA, SAN ANTONIO, TEXAS 78205 ON FRIDAY, JANUARY 16, 2015 AT 2:00 P.M., TO CONSIDER THE FOLLOWING MATTERS:

1. Approval of the minutes from the January 8, 2015 meeting of the Mayor's Task Force on Preserving Dynamic and Diverse Neighborhoods

Briefing on

2. A discussion on the rights of renters
3. A discussion on potential inclusionary housing policies
4. A discussion on potential relocation policies

Adjourn

At any time during the meeting, the Task Force may meet in executive session regarding above items, pursuant to Texas Government Code Section 551.071 (consultation with attorney).

DISABILITY ACCESS STATEMENT

This meeting place is accessible to persons with disabilities. City Hall and Municipal Plaza Building are wheelchair accessible. The accessible entrance for City Hall is an accessible Entry Ramp on Westside of Building located at 100 Military Plaza. The accessible entrance for Municipal Plaza is located at 114 W. Commerce. Auxiliary Aids and Services are available upon request (Interpreters for the Deaf must be requested forty-eight (48) hours prior to the meeting.) For assistance, call (210) 207-7268 or 711 Texas Relay Service for the Deaf.

Item 1

Approval of the minutes from the January 8, 2015
meeting of the Mayor's Task Force on Preserving
Dynamic and Diverse Neighborhoods

MAYOR'S TASK FORCE ON PRESERVING DYNAMIC AND DIVERSE NEIGHBORHOODS
MEETING MINUTES
THURSDAY, JANUARY 8, 2015
5:00 PM
MEDIA BRIEFING ROOM

Members Present: Mayor Ivy R. Taylor, Chair
Councilmember Roberto C. Trevino, *District 1*
Councilmember Rey Saldaña, *District 4*
Councilmember Shirley Gonzales, *District 5*
Councilmember Rebecca Viagran, *District 3*
David Adelman
Dr. Christine Drennon
Jackie Gorman
Nettie Hinton
Richard Milk
Rod Radle
Susan Sheeran

Members Absent: Maria Berriozabal

Staff Present: Carlos Contreras, *Assistant City Manager*; Shanon Miller, *Director, OHP*; Lori Houston, *Director, CCDO*; Colleen Swain, *Assistant Director, CCDO*; Michael Taylor, *Assistant Director, DPCD*; Hollis Young, *Deputy City Attorney, CAO*; Denise Frederick, *Assistant City Attorney, CAO*; Hollis Young, *Assistant City Attorney, CAO*; Brandon Smith, *Office of the City Clerk*

Others Present: Chuck Bayne, *Urban Connection*; Christine Bradshaw, *VIA*; Jessica O. Guerrero, *Mission Trails Resident*; Carmen Tafolla, *UTSA*; Marisol Cortez, *Right to the City SA*; Elizabeth Delgado, *TAMUSA*; Mu Sorchi, *TOP*; Kristin Ramirez, *UTSA*; Amanda Haas, *Community Member*; Joseph Windham, *SEIU, Texas*; Stephanie Serna, *KSAT*; Daria Chapa, *Our Casas Residential Council*; Sofia Bahena; Marianne Kestenbaum

Call to Order

Mayor Taylor called the meeting to order and acknowledged a statement from Maria Berriozabal in her absence. Brandon Smith stated that a copy of her statement had been provided to the Task Force and that any comments could be addressed to Mayor Taylor.

1. Approval of minutes from the December 11, 2014 meeting of the Task Force on Preserving Dynamic and Diverse Neighborhoods

Richard Milk referenced Extra Assistance for Special Circumstances in the minutes and noted that the context of the discussion regarding the rules for home owners that were non-occupants was Mobile Home Parks. He requested that said clarification be included in the minutes because it was a critical part of the discussion.

Rod Radle moved to approve the minutes as amended. Councilmember Gonzales seconded the motion. Motion carried by those present.

Mayor Taylor opened the floor for discussion, reflection, and commentary prior to addressing the scheduled agenda items.

Councilmember Gonzales reported that in the 2015 Budget; she received \$1,000,000 over the course of five years, for Home Housing Rehab Projects. She stated that there had been difficulty identifying eligible participants due to various issues, such as no home owner's insurance and the condition of the home. She spoke in support of the program as a viable solution to stabilize older neighborhoods. She noted consideration of including a similar component to the Bond Program.

Dr. Christine Drennon spoke in support of a series of revitalization programs with public funding. She cited that other cities have utilized Home Improvement Revenue Bonds and made money available at a low interest to enable residents to stay in their neighborhoods. She expressed concern with the Task Force proposing relocation policies as one of their first tasks. She suggested that the focus be centered on getting residents to stay in their neighborhoods before considering policy to relocate them.

Susan Sheeran stated that she was unaware that revitalization programs existed. She asked Councilmember Gonzales if funding was requested specifically for her district and if other Councilmembers were aware that funding was available to them. Councilmember Gonzales replied that she had requested the funding.

Mayor Taylor spoke of the Home Repair Program and referenced the challenges indentifying eligible participants articulated by Councilmember Gonzales. She cited eligibility challenges and the reduction of federal funding for the lack of participation and expansion of the program. She stated that in recent years there has been more of an emphasis on utilizing Home Repair Funds to close the gap for low income tax credit projects. Ms. Sheeran spoke in support of securing alternate funding sources and noted stipulations placed on Federal Funds over \$5,000.

At this time Jackie Gorman entered the meeting.

Councilmember Viagran stated that this Task Force was created after a difficult zoning case regarding the Mission Trails Mobile Home Park. She provided an update on the issue and reported that her Staff has: 1) Ensured that resources are available to the remaining residents; 2) Met with the six remaining families on December 17, 2014 along with the Department of Health and Human Services (DHS) and partnered with Catholic Charities; 3) Ensured that security and increased presence was provided; and 4) Worked with DHS to provide Housing Counselors to brief the residents on due process and their legal rights. She noted that the residents expressed an interest in the possibility of acquiring land to relocate together with the Residency Council. She discussed the land issue with Mayor Taylor and the Mayor Taylor recommended exploring city land surplus options.

Rod Radle stated that the main issue is that the City does not have policy in place that would require developers to adhere to guidelines to address relocation. In response to Mayor Taylor, Mr. Radle replied that anytime the city takes action, as in the zoning case, the city can enact policy.

Jackie Gorman asked the Task Force to take into consideration that there are property owners who have accepted the risk of ownership, paid taxes, and maintained property. In an effort to protect renters, do not strip those property owners of the value of their property or the right to sell it. She stated that there must be a balance.

Mayor Taylor stated that the Task Force will provide recommendations to the full Council in Spring 2015. She stated that the goal was not to have philosophical discussions on what has transpired over the years, but

to provide recommendations on ongoing structure (i.e. Council Committee or City Commission), further action, or policy. She entertained recommendations from the Task Force at this time.

At this time David Adelman entered the meeting.

Richard Milk proposed the following: 1) Permanent Task Force/Organization to oversee policy recommendation and staffed by multiple city departments; 2) Team devoted to monitoring and gathering data on the progress of policy goals; 3) Long term policy goals over the next 20 years; and 4) Short term strategies.

Councilmember Saldaña proposed a goal centered around renters rights and to begin discussion on indentifying the most vulnerable population in need of assistance. He stated a short term goal to have San Antonio have the most protected rights for low income renters.

David Adelman spoke in support of Councilmember Saldana's recommendation and proposed to separate assistance to the most vulnerable population into two designations: 1) Financial Assistance; and 2) All other public assistance. He proposed to identify all public assistance resources and deploy them in the right places.

Mayor Taylor provided an overview of proposed items for Task Force direction to include the following:

- ✓ *Renter's Rights*
- ✓ *Relocation Benefits Policy*
- ✓ *Recommend Affordable Workforce/Housing Bond for the 2017 Bond*
- ✓ *Long Term Owner Occupied Tax Abatements*
- ✓ *Creation of a Task Force permanently charged with implementing new policies*
- ✓ *City created Team to monitor and gather data the progress of policy goals*
- ✓ *Low interest funds for rehab*
- ✓ *Housing Summit*
- ✓ *Re-evaluate the San Antonio Housing Trust*

2. **A discussion on the articles and materials provided to the Task Force to date.**

3. **A discussion on neighborhood preservation.**

4. **A discussion on additional affording housing options.**

5. **Next steps on proposed policy solutions.**

Adjourn

There being no further discussion, the meeting was adjourned at 6:55 PM.

Respectfully Submitted,

Ivy R. Taylor, Mayor

*Brandon T. Smith
Office of the City Clerk*

Item 2

A discussion on the rights of renters

**CITY OF SAN ANTONIO
DEPARTMENT OF PLANNING AND COMMUNITY DEVELOPMENT
BRIEFING MEMO**

TO: Mayor's Task Force on Preserving Dynamic & Diverse Neighborhoods

FROM: John M. Dugan, Director, Department of Planning and Community Development

SUBJECT: Tenant Rights and Tenant Advocacy Services

DATE: January 16, 2015

Briefing regarding Tenant Rights in Texas and a comparison of Tenant Advocacy Services in the City of San Antonio and other Texas cities.

Tenant Rights in Texas

- Tenant Rights in Texas are primarily governed by Chapter 92 of the Texas Property Code
- Basic Tenant Rights
 - o Peace and Quiet – Landlord cannot evict without cause or otherwise interfere with tenant's right to peace and quiet
 - o Health and Safety – Landlord must repair, within a reasonable time, any condition that materially affects your health and safety.
 - o Security - A dwelling must be equipped with security devices such as window latches, keyed dead bolts on exterior doors, sliding door pin locks and sliding door handle latches or sliding door security bars, and door viewers.
- Additional Tenant Rights and Responsibilities may be outlined in lease agreements. The Texas Apartment Association (TAA) lease agreement is the industry standard in Texas. TAA represents 1.9 million units throughout the state.

Tenant Advocacy Services

- Tenant advocacy services are typically provided by a city, housing authority, or nonprofit organization known in Texas as a Tenant Council. Tenant advocacy services in the City of San Antonio are provided by the Department of Human Services Fair Housing Program.
- Typical tenant advocacy services include
 - o Tenant organizing
 - o Advocate to change such rules, regulations, practices or policies of management as are found to be unfair or inequitable to tenants of the community;
 - o Advocate to protect the life or property of tenants of the community, all within the framework of existing laws and lawful regulations;
 - o Act independently or cooperatively with others to inform tenants of their rights and privileges under existing laws – federal, state, or local;
 - o Educate residents and the general public and about housing rights
 - o Advocate for the preservation and promotion of housing
 - o Secure a place for tenants at the decision-making table
 - o Develop allies in the community who can assist tenant leaders in achieving their goals

- Staff reviewed tenant advocacy programs in Texas. The matrix includes the basic information on the programs that were reviewed. Staff did not find a program that provides specialized services to residents displaced as a result of gentrification or a program that routinely provides guidance and support to the developers funding relocation services for displaced residents.

Recommendation

The table below includes two options for providing tenant advocacy services to residents displaced as a result of gentrification and guidance and support to developers funding relocation services for displaced residents. Option 1 includes expanding family assistance services provided by the City’s Department of Human Services. Option 2 includes establishing a non-profit housing trust similar to ones found in other major cities in Texas.

Option	Pros	Cons
1. Expand COSA DHS Family Assistance Services	<ul style="list-style-type: none"> • Does not require new organizational infrastructure • Access to COSA network of resources • Greater tracking and accountability – City has ability to repeal incentives if services are not provided 	<ul style="list-style-type: none"> • Tenants (especially undocumented residents) may be less likely to interact with City • Additional resources required
2. Establish Non-profit Housing Trust	<ul style="list-style-type: none"> • Non-profit could assume greater tenant advocacy role • Non-profit can more quickly realign staffing and resources to meet changing needs • Greater promotion and outreach • Could attract financial support from philanthropic community • Singular focus increases visibility to general public 	<ul style="list-style-type: none"> • Requires startup funds. Startup funds could be provided by LISC • Non-profit must spend time fundraising • Some services may be duplicative

Tenant Advocacy Programs in Texas

	Austin	Ft. Worth	Houston	El Paso	San Antonio
Programs & Services	Fair Housing Program Telephone Counseling Mediation Services In-House Counseling Lease Forms	Free weekly tenants' rights workshops Written materials including a Handbook of Tenants' Rights (available in English and Spanish) Organizing assistance Counseling to help individuals solve their tenant/landlord problems. Training for tenants on how to represent themselves in the Justice of the Peace court in cases with their landlord. Referrals for emergency rent assistance, legal help, and/or appropriate social services.	Fair Housing Program Telephone Counseling Lease Forms	Establishing high professional and ethical standards for our members. Seeking to provide better values for our customers, the public. Striving continually to promote education and professionalism to create a better image in the eyes of the public we serve. Establishing working relationships with the municipal employees and other organizations to improve our industry. Supporting legislative efforts that protect the interests of our members and the residents we serve.	Tenant and landlord mediation Default counseling to homeowners Investigation of discrimination complaints Home Equity Conversion Real estate advertisement monitoring Plan reviews for accessibility requirements Referrals and community outreach Fair Housing laws Tenant/landlord rights Predatory lending Financial literacy Scam activities
Resources	Affordable Housing Fact Sheets Spanish Literature Forms Newsletters Texas Property Code	National Alliance of HUD Tenants National Housing Law Project National Housing Trust Housing Preservation Project U.S. Department of Housing and Urban Development National Low Income Housing Coalition Texas Department of Housing and Community Affairs' Preservation Program Southwest Housing Compliance Corporation (The Contract Administrator for many Section 8 properties in Texas)	Brochures: Evictions Landlord's lien Lockout Locks Repairs Security deposits Small claims court Utility shut off Printed Materials: Tenant-landlord forms Agency newsletters	National Apartment Association Texas Apartment Association	FHA loss mitigation VA loss mitigation Texas Tenant Advisor Austin's Tenant Council Bexar County Dispute Resolution Center Legal Aid Texas Commission on Human Rights
Boards	8 Member Board	Info Not Available	Info Not Available	Texas Apartment Association's State Affordable Housing Advisory Committee	No Board
Funding	U.S. Department of Housing and Urban Development	Info Not Available	Info Not Available	Private	U.S. Department of Housing and Urban Development
Website	http://www.housing-rights.org/	http://www.txtenants.org/	http://www.houstontenants.org/	http://www.epaa.org/	http://www.sanantonio.gov/humanservices/FinanceEmergency/FairHousing.aspx

Item 3

A discussion on potential inclusionary housing policies

**CITY OF SAN ANTONIO
DEPARTMENT OF PLANNING AND COMMUNITY DEVELOPMENT
BRIEFING MEMO**

TO: Mayor's Task Force on Preserving Dynamic & Diverse Neighborhoods

FROM: John Dugan, AICP, Director, Department of Planning and Community Development

SUBJECT: Inclusionary Housing Requirement for City-Incented Residential Development

DATE: January 16, 2015

SUMMARY:

This document provides a briefing on a draft inclusionary housing requirement for any city-incented development containing a residential component, as requested by the Mayor's Task Force on Preserving Dynamic and Diverse Neighborhoods, toward its goals of fostering residential income diversity and mitigating the effects of involuntary residential displacement.

BACKGROUND INFORMATION:

Inclusionary housing: the practice of requiring affordable and/or workforce housing units as a portion of a market-rate residential development.

Notable examples of inclusionary housing ordinances include:

- Montgomery County, Maryland
- New York City
- Fairfax County, Virginia
- Chicago

While mandatory provision of affordable units is required in many U.S. cities, such mandates are prohibited in Texas. A local alternative is to tie *voluntary* incentives to the provision of affordable and workforce units.

Purpose: to ensure that city-based incentives result in equitable development activities within the city limits.

Residential Income Segregation Index (RISI): According to the Pew Research Center, the San Antonio-New Braunfels metropolitan area has the highest residential income segregation of any large metro area in the U.S. This means many of the area's census tracts primarily consist of either lower-income or upper-income households. Highlights of the study include:

- San Antonio-New Braunfels RISI score: 63 out of 200 (a RISI of 200 indicates that 100 percent of lower-income and upper-income households reside in a census tract of households only in their same income bracket; therefore, lower is better).
- The national RISI is 46.
- From 1980 to 2010, the San Antonio-New Braunfels metropolitan area experienced the second-largest increase in its RISI score nationally, up 24 points from its 1980 score of 39.

ANALYSIS:

Staff determined that the analysis completed by the Pew Research Center could be refined based on U.S. Census data retrieved at the block group level, rather than at the larger tract level. This would help identify income segregation (or diversity) at a more granular level.

Using American Community Survey 2009-2013 five-year estimates for household income, staff conducted a GIS analysis to determine an income majority for each census block group in Bexar County. The summary of the findings of this analysis are below:

- Lower-income households make up the majority of households in 236 block groups (21.8% of block groups in Bexar County); lower-income households are classified as those earning less than 67 percent of the City of San Antonio Median Household Income of \$45,722.
- Middle-income households—earning between 67 and 200 percent of the median—make up the majority of households in 571 block groups (52.7% of block groups).
- Earning more than twice the median income, upper-income households were the majority in 80 block groups (7.4% of block groups).
- The remaining 197 block groups (18.2% of block groups) had no majority in terms of household income category.

Draft Policy: City-based incentives for residential development will be determined, in part, by whether the creation of the housing units increase or decrease residential income diversity in a census block group. City incented projects will be required to provide a minimum number of affordable/workforce housing units based on the Income Majority Category for the block group in which the project will be located. The formula in the table below outlines the number of units required for each Income Majority Category.

Incentives subject to the inclusionary housing policy include, but are not limited to:

- Center City Housing Incentive Policy (CCHIP)
- Tax Increment Financing (TIF)
- City tax abatements, and
- Acquisition of city-owned property.

Applicability: All developments with a residential component of more than twelve (12) units that receive any City incentives. Developers will be required to set aside a specified share of workforce and/or affordable housing units according to the table below:

Income Majority Category	Example Area	Set Aside	Income Targets	# of Affordable/ Workforce Units Required in 300 Unit Development
Low Income	Alamodome; AT&T Center	0 – 5%	80-120% AMI	0 – 15
Middle Income	Pearl Brewery	10 – 15%	80-120% AMI	30 – 45
Upper Income	Dominion Country Club	15 – 20%	80-120% AMI	45 – 60
No Majority	Brooks City-Base; Six Flags	0 – 10%	80-120% AMI	0 – 30

* AMI: Area Median Income

RECOMMENDATION:

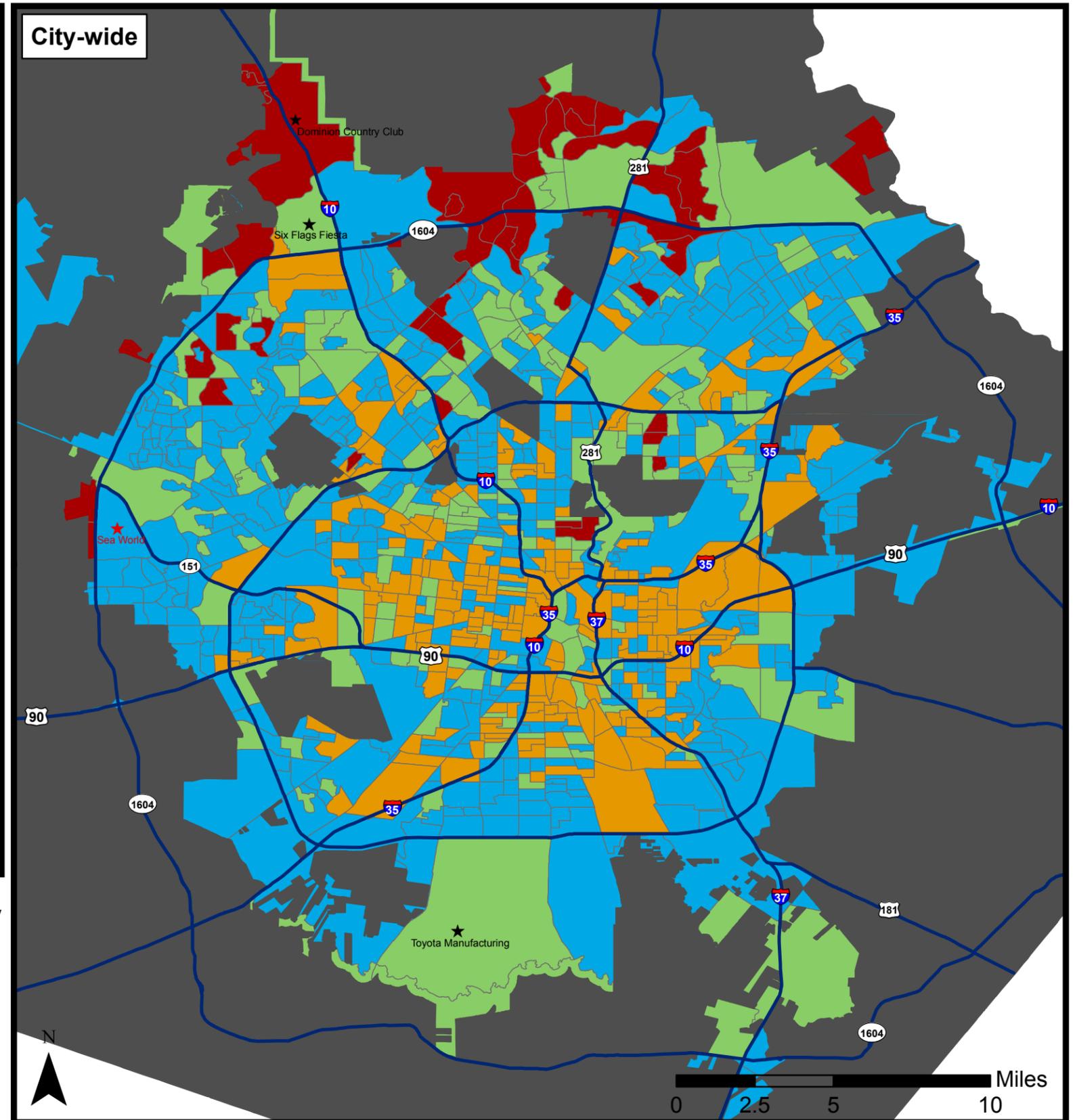
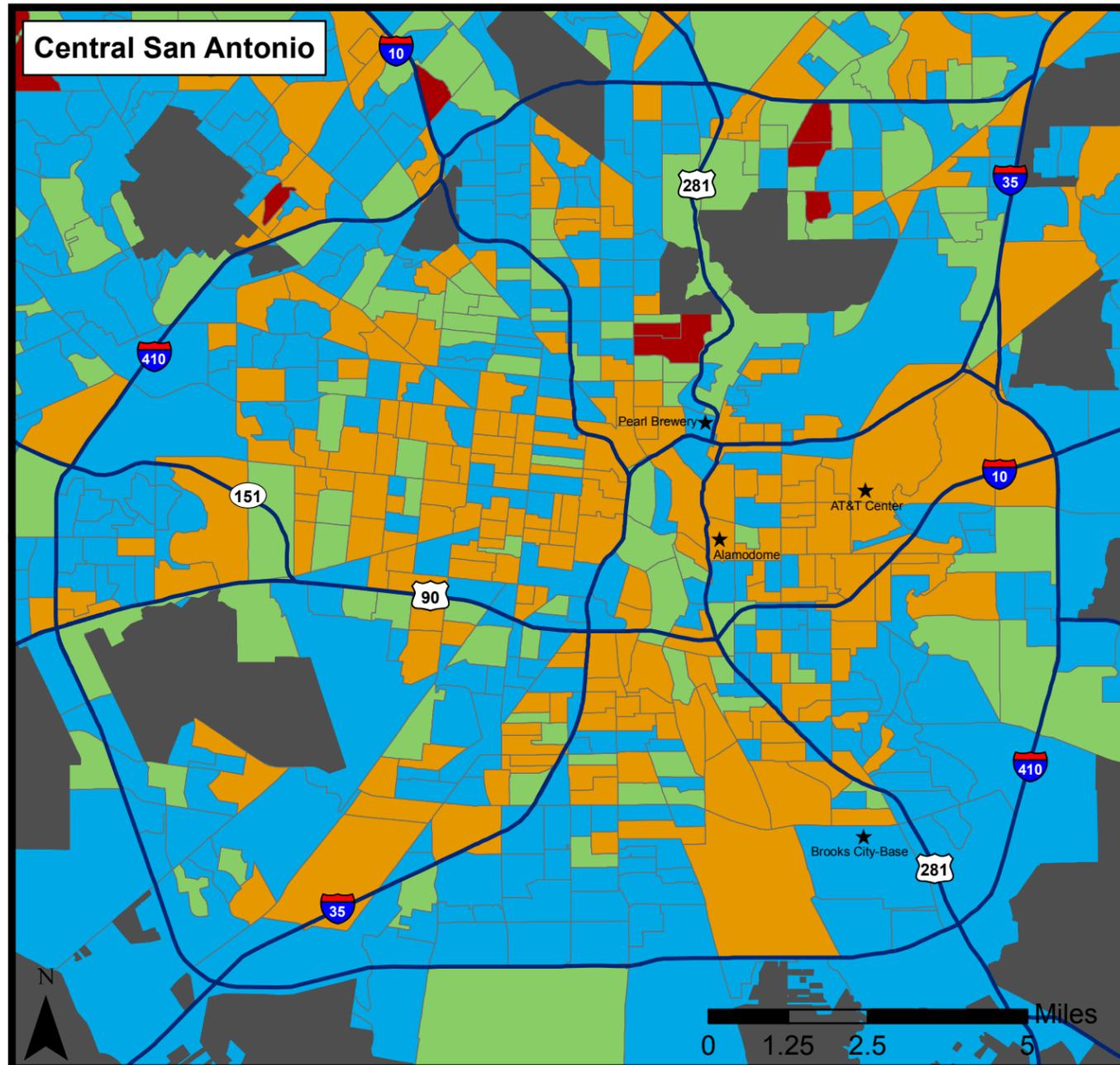
This memorandum is for briefing purposes only. The Mayor’s Task Force on Preserving Dynamic and Diverse Neighborhoods is being asked to comment on a draft policy for an inclusionary housing requirement for city-incented residential developments as a means of fostering residential income diversity in San Antonio.

Residential Segregation by Income, 2009-2013

City of San Antonio



CITY OF SAN ANTONIO
DEPARTMENT OF PLANNING
& COMMUNITY DEVELOPMENT



Legend

— Major Highways

Income Majority by Census Block Group

- No Majority (Low Residential Segregation)
- Middle-income
- Low-income (High Residential Segregation)
- Upper-income (High Residential Segregation)

Income levels based on American Community Survey
2009-2013 5-year estimates
(U.S. Census Bureau)

Median Unadjusted Household Income:
\$45,722
(2009-2013 5-year ACS estimate for
City of San Antonio)

Matrix of Inclusionary Housing Program Requirements

Jurisdiction	Set Aside (of Total Residential Units)	Income Targets	Minimum Development Size	Benefit to Developer
Seattle, WA	20%	For Rent: 65% - 85% of median For Sale: 100% - 120% of median	4 units (targeted areas only)	Tax exemption on residential improvements on multifamily projects
Boston, MA	15%	For Rent: 100 - 125% AMI For Sale: 130 - 160% AMI		
Boulder, CO	20%	For Rent: 70% AMI For Sale: 80% AMI	No minimum	
New York, NY	20%	80% AMI		Density bonus
San Francisco, CA	15% (20% if provided off-site)	For Rent: 60% AMI of county, up to 120% For Sale: 100% AMI of city and county	10 units	
Washington, DC	8% - 10% of floor area ratio OR 50% - 75% of the bonus density	50 - 80% AMI	10 units or addition of 50% floor area to existing buildings	Density bonus
Montgomery County, MD	12.5% - 15%	Depends on building type; \$30,000 min. household income for rental	20 units	

Item 4

A discussion on potential relocation policies

CITY OF SAN ANTONIO
CENTER CITY DEVELOPMENT AND OPERATIONS DEPARTMENT
BRIEFING MEMO

TO: Mayor's Task Force on Preserving Dynamic & Diverse Neighborhoods

FROM: Lori Houston, Director, Center City Development and Operations Department

SUBJECT: Relocation Assistance for Renters

DATE: January 16, 2015

SUMMARY:

Briefing regarding a draft relocation assistance policy for projects that receive City incentives. Currently, the City of San Antonio requires relocation assistance for projects that receive federal funding. In these cases, the Uniform Relocation Assistance Act is followed. Staff has drafted a policy that would require developers of projects that receive City incentives to provide financial and technical assistance to tenants displaced by their development.

Staff researched best practices in an effort to develop a draft policy. Common best practices are as follows:

- Developer or property owner pay for assistance
- City enforces policy and issues fines and penalties associated with program
- Special circumstance stipends vary by entity
- Almost all entities provide additional technical assistance and counseling
- Permit or relocation claim is required to receive assistance
- Eviction notice required

The attached matrix summarizes the Uniform Relocation Assistance Act as well as the policies of the best practices that staff researched. Additionally, the matrix summarizes the draft policy for the City of San Antonio.

Best Practices - Tenant Relocation Policies

	Uniform Relocation Assistance Act (Federal)*	Austin***	Dallas	Boston	Chicago	Los Angeles	Maryland	Seattle	Proposed COSA (Incentives Utilized)
Who Manages Program	Federal Agency	City	City	City	City	City	State	City	City
Who Pays Assistance	Federal Agency	Developer/Owner	Property Owner in Skillman TIF District	Property Owner	Property Owner	Property Owner	Property Owner	City Pays Half and Property Owner Pays Half	Developer/Owner
Managing Department	Varies	Housing & Community Development	Planning	Neighborhood Housing	Code	Housing & Community Investment	Varies by City	Planning and Development	TBD
What Triggers Assistance	Federal Funded Project	Non-Subsidized Housing	Project located in Skillman TIF	Condominium Conversion Projects	Any residential Rental Units	Any tenant not at fault eviction notice	Any Non-Federal Funded Projects	Any Non-Federal Funded Projects	City Incentives Utilized
Amount Per Tenant	Based on 42 Month Formula**	1 month Rent plus \$300 stipend	\$500	\$3,000	\$1,500	Payments vary depending on qualifications and/or eligibility (\$7,450 - \$19,300)	\$3,000	\$3,000	12 Month Formula similar to Federal (still drafting)
Eligible Income Levels	Agency standards to qualify for housing grants, loans or contributions to include CDBG and Section 108	80% or below MFI	No income limits	No income limits	At or Below 120% MFI	No Income limits	No income limits	No income limits	80% or below MFI
Extra Assistance for Special Circumstances	Special rules for mobile home owners who are non-occupants	Additional \$400 relocation stipend for persons 65 or older	For families with school-age children	\$2,000 extra for households with one or more tenants, senior persons with disabilities and for low to moderate income households	If a tenant's rent is greater than \$1,500, the tenant may receive up to \$2,500	None	None	None	Additional \$400 stipend for persons 65 or older
Other Types of Assistance	Advisory services related to housing financing, health, welfare, or legal assistance	Moving Assistance Counseling	Family Counseling, job relocation TA,	Counseling and relocation technical assistance	Counseling and relocation technical assistance	No	Counseling and relocation technical assistance	Counseling and relocation technical assistance	Moving and Relocation Technical Assistance
Permit/Relocation Claim Required	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes
Eviction Notice Requirements	Minimum 90 Day Notice Required with specific milestones set in place	180 Days	90 Days	120 Days	120 days	90 Days	180 Days	90 Days	120 Days
Enforcement Tools Available for Non-Payment	Property liens, use of collection agency, and enforcement of fines	Researching	Researching	Property liens, use of collection agency, and enforcement of fines	Property liens, use of collection agency, and enforcement of fines	Property liens, use of collection agency, and enforcement of fines	Researching	Property liens, use of collection agency, and enforcement of fines	Property liens, use of collection agency, and enforcement of fines
Appeal Process Available	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes	Yes

* Best Practice and overall standard for all States as it relates to Federal Funding

** Rental Assistance 42-Month Rule

Current Base Monthly Rent - New Base Monthly Rent X 42 = Assistance Amount

*** Proposed Ordinance