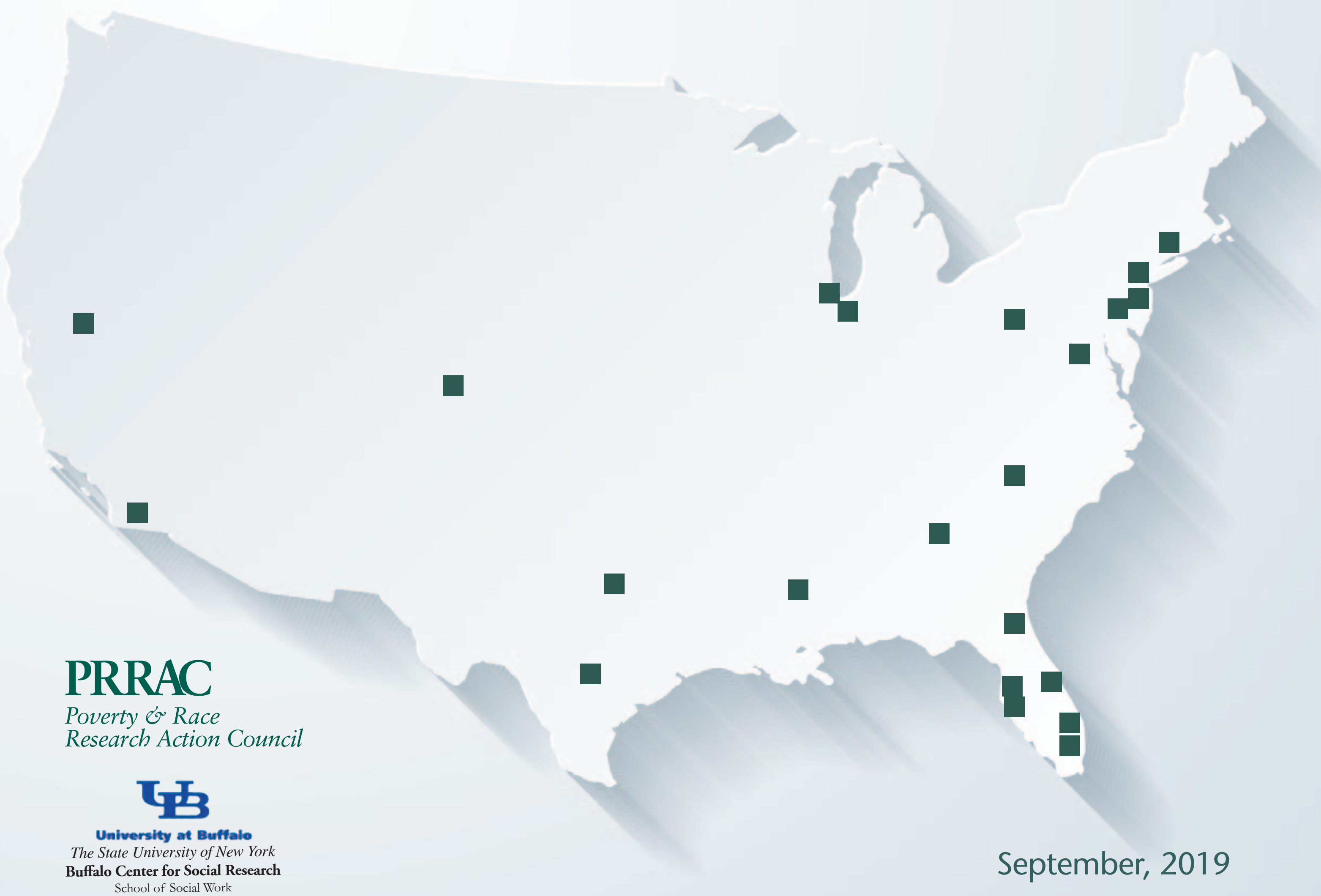
Small Area Fair Market Rents (SAFMRs):

An analysis of first year implementation in mandatory metropolitan areas and barriers to voluntary implementation in other areas.



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Regions covered by the mandatory Small Area FMR rule

Introduction

In November 2016, the Department of Housing and Urban Development (HUD) issued its final rule for the implementation of Small Area Fair Market Rents (SAFMRs) (Federal Register, 2016). The purpose of the rule was to begin the process of changing the basis for setting payment standards for the Housing Choice Voucher (HCV) program. Historically, payment standards were based on Fair Market Rents (FMRs) which represent average rents in metropolitan areas. This approach to setting payment standards contributed to the concentration of HCVs in low-income and minority neighborhoods. Under SAFMRs, payment standards are based on average rents in ZIP codes. The new rule was adopted to achieve two primary benefits (CBPP & PRRAC, 2018). First, SAFMRs were expected to provide voucher holders with greater access to high-opportunity neighborhoods (i.e. places that offered a better mix of employment, educational, transportation opportunities). This outcome was anticipated since payment standards would increase in ZIP codes where average rents were higher than metropolitan FMRs. Second, SAFMRs were expected to make the voucher program more cost-effective by reducing overpayments to landlords in lower rent neighborhoods.[1] This outcome was anticipated since the adoption of SAFMRs would lower payment standards in ZIP codes where average rents were lower than metropolitan FMRs. This adjustment to payment standards on the lower spectrum of a region's rental market was expected to reduce the likelihood of landlords setting rents above the market rate for comparable units in these ZIP codes.[2]

Initially, the new rule became effective on January 1, 2018, with implementation in mandatory areas beginning on April 1, 2018. The rule was made mandatory in 23 metropolitan areas. In addition to the 23 mandatory areas, metropolitan Dallas was already required to use SAFMRs in the implementation of the HCV program under a separate court settlement in 2011. Implementation of the rule was voluntary in other metropolitan areas across the United States. In August of 2017, HUD attempted to suspend the new rule, but in December of 2017 a U.S. District Court judge ordered the rule to be reinstated (Thrope, 2018).

This report has two foci. First, it examines the implementation strategies adopted by public housing authorities (PHAs) in metropolitan areas mandated to use SAFMRs. This analysis has a particular focus on the degree to which the setting of "payment standards" in 2018 supported the dual goals of expanding voucher holders' access to high-opportunity areas and enhancing the overall cost-effectiveness of the HCV program. Under HUD rules, PHAs may set the payment standard anywhere between 90-110% of the defined FMR or SAFMR. In addition to examining how payment standards were set during the initial implementation of HUD's new SAFMR rule, this part of the report is also informed by a content analysis of other archival materials, public documents, and primary materials supplied by local PHAs. The analysis of these data are used to identify best practices and policy frameworks for future HCV program implementation in areas mandated to use SAFMRs.

The second part of this report examines how PHA administrators in metropolitan areas not mandated to adopt SAFMRs perceive the feasibility of their voluntarily adoption. This analysis takes the form of a case study and it is based on in-depth interviews with PHA administrators in Buffalo, New York. The analysis focuses on PHA administrators' perceptions of barriers to voluntary adoption of SAFMRs.
After results are presented from both parts of the report, it concludes with two sets of

1 In their empirical analysis of rent structures in low-income neighborhoods, Desmond and Wilmers (2019) found that landlords are more apt to overcharge tenants relative to the market value of property in poor neighborhoods.

2 Although the adoption of SAFMRs entailed some additional operational costs, the new rule resulted in increased cost accuracy in relation to payment standards which resulted enhanced cost-effectiveness for the overall program.

recommendations. The first focuses on lessons learned from the analysis of metropolitan areas mandated to use SAFMRs. The second set of recommendations focuses on lessons learned from metropolitan areas that have the option to voluntarily implement SAFMRs. Each set of recommendations had three targets audiences: administrators within HUD, local PHA that implement the HCV program, and applied researchers and policy advocates.

Small Area Fair Market Rents SAFMRs

The Lead-up to SAFMRs

HUD's new SAFMR rule was developed in response to a number of concerns about the effectiveness of the HCV program in deconcentrating poverty and providing low-income households with access to upward mobility. Historically, these concerns date back to issues raised in cases like *Gautreaux v. Chicago Housing Authority* (1969), *Walker v. HUD* (1989), and *Thompson v. HUD* (2005). In response to those decisions, programs and public policies were developed to increase opportunities for recipients of housing vouchers to move out of segregated, impoverished neighborhoods.[3] Some of these programs included the Gautreaux program in Chicago, the Move to Opportunity program, and other housing mobility programs that were adopted across the country on a demonstration basis. The development of policies scaling up these programs has become increasingly salient, since HCVs are one of HUD's primary tools to provide affordable housing to low-income households. In 2017, there were over 2.2 million rental units subsidized using HCVs (U.S. Department of Housing and Urban Development, 2017). These 2.2 million units represented over 48% of all rental units subsidized across the eight federal programs designed to subsidize rental housing. In 2017, almost 5.3 million people were housed using HCVs. They comprised almost 55% of all renters receiving housing assistance across the eight federal rental subsidy programs.

In addition to programs and policies adopted in response to landmark decisions in the courts, advocates have encouraged HUD to pursue administrative rule changes to address shortcomings in the implementation of the HCV program. In particular, advocates have been critical of how the use of metropolitan-wide FMRs, and the calculation of payment standards based on them, impede geographic mobility and housing searches in high-opportunity neighborhoods (Thrope, 2018) One of the more cogent critiques of metropolitan-wide FMRs is that they fall short of providing tenants with adequate subsidies to rent in high-opportunity neighborhoods. Researchers have identified this as problematic since metropolitan-wide FMRs, whether set at the 40th or 50th percentile rent, by definition fall below average rents in relatively high cost submarkets in metropolitan areas (Palm, 2018; Treat, 2018; Thrope, 2018). This limitation of FMRs is compounded by data lag, since FMRs are calculated using data from the American Community Survey (ACS) which is released two years from its date of collection. One rationale for HUD allowing PHAs to set payment standards within a 90%-110% range of its published FMRs to address some of these limitations. However, in many high-opportunity areas, as well as localized housing markets experiencing gentrification and other forms of upward pressure on rents, the ability to set payment standards at 110% of FMRs still does not close the affordability gap. To address this issue, SAFMRs have been advocated for as a tool to promote housing opportunity on a metropolitan-wide scale.

One of the more cogent critiques of metropolitan-wide FMRs is that they fall short of providing tenants with adequate subsidies to rent in high-opportunity neighborhoods.

3 There were complementary efforts to address the concentration of low-income housing at the state level. One of the more prominent decisions was *Southern Burlington County NAACP vs. Township of Mount Laurel* (1975). The Mount Laurel decision was designed to remedy government policies that actively created segregation in housing using fair share housing as a tool.

The Dallas Settlement and the SAFMR Demonstration Project

The first opportunity to test this tool came in 2011 as a result of a court settlement that resolved a complaint charging that payment standards based on FMRs in the Dallas metropolitan areas resulted in the concentration of vouchers in low-income areas (Ellen, 2018; Treat, 2018). Under the settlement, all PHAs in metropolitan Dallas agreed to use SAFMRs when setting payment standards. An early analysis of outcomes in Dallas suggested that the adoption of SAFMRs resulted in improved neighborhood quality for HCV recipients and modest cost savings for PHAs (Collinson & Gannong, 2014). It is noteworthy that Palm (2018) and Treat (2018) cautioned against assuming that these outcomes can be easily replicable across other metropolitan areas with different characteristics. During the timeframe that data from Dallas were examined, vacancy rates exceeded 8%. In tighter housing markets, the outcome of SAFMRs are expected to be more modest.

Shortly after the Dallas settlement, HUD created its own SAFMR demonstration program. The purpose of the demonstration program was twofold (Kahn & Newton, 2013). First, it was created to test the effectiveness of SAFMRs in improving tenants' access to high-opportunity areas as well as the residual impacts on tenants living in areas with SAFMRs below metropolitan FMRs. Second, the demonstration program was created to understand the administrative and budget effects on PHAs that adopt SAFMRs. The demonstration program was designed to run from 2012-2016. Five PHAs were included in the demonstration program (see Table 1).[4] They were selected in order to include PHAs: from different regions of the country, that administered different volumes of HCVs, and that served clients from different demographic segments of the population. In addition to the five PHAs selected to participate in the SAFMR demonstration program, HUD added two PHAs from the Dallas metropolitan area that were already implementing SAFMRs under the court settlement. These two PHAs are also listed in Table 1.

Table 1: 2011 Characteristics of PHAs in the Small Area Fair Market Rent (SAFMR) Demonstration Program

PHA Name (State)	Total HCV Units	HCV Recipients: Percent Minority	HCV Recipients: Percent Hispanic	HCV Recipients: Percent 62 Years and Over	Tracts with HCV Resident Percent of Total Population Minority
SAFMR Demonstration Participants:					
Chattanooga Housing Authority (TN)	3,183	82	2	15	54
Housing Authority of Cook County (IL)	12,622	83	3	58	52
Housing Authority of the City of Laredo (TX)	1,368	100	99	20	95
City of Long Beach Housing Authority (CA)	6,556	88	11	23	83
Town of Mamaroneck Housing Authority (NY)	647	54	22	39	32
PHA Added from the Metropolitan Dallas Area:					
Housing Authority of the City of Dallas (TX)	18,525	94	5	17	67
Housing Authority of Plano (TX)	908	65	3	29	39

Source: Finkel, M., Dastrup, S., Burnett, K., Alvarez, T., Carissa, C. and de Sousa, T. (2017). *Small area fair market rent demonstration interim report.* Washington, DC: HUD, Office of Policy Development and Research.

4 The SAFMR demonstration program ended in 2016. At that time, four of the five PHAs participating in it continued to use SAFMRs on a voluntary basis, they included: the Chattanooga Housing Authority, the Housing Authority of Cook County, the City of Long Beach Housing Authority, and the Mamaroneck Housing Authority. One of these PHAs, the Housing Authority of Cook County, is in the Chicago-Joliet-Naperville metropolitan area which was subsequently mandated to adopt the new SAFMR rule. The Housing Authority of Laredo was the only PHA to discontinue the use of SAFMRs after the demonstration program ended.

At the end of the demonstration program, HUD released an evaluation report (Dastrup et al., 2018). The report focused on various aspects of the demonstration program, including the effectiveness of SAFMRs in improving tenants' access to high-opportunity areas and the effects of SAFMRs on HCV implementation costs. In terms of tenants' access to high-opportunity areas, the results of the evaluation indicated that SAFMRs had a positive impact. The switch to SAFMRs made HCV holders slightly more likely to live in high-rent ZIP codes than they were before the demonstration program. This was the case for new HCV holders and tenants who already held vouchers and moved to new ZIP codes after the demonstration program began. These destination areas had lower poverty, higher school proficiency, proximity to employment, environmental quality, and lower crime.

In terms of PHA implementation costs, the switch to SAFMRs resulted in modest reductions in overall costs for PHAs. Although there was variation across the PHAs, on average increases in payment standards in high-rent ZIP codes were offset by lower payment standards in low-rent areas. Moreover, when the PHAs in the demonstration program were compared to a control group, the overall cost savings were greater in terms of payment standards and Housing Assistance Payment (HAP) costs for demonstration program participants. One caveat that explains the modest reduction in overall costs was that PHAs followed a policy to hold existing tenants in low-rent ZIP codes harmless from reduced payment standards until their units went through their second annual recertification. This meant that there was a lag in PHA savings from reduced payment standards in low-rent ZIP codes, as well as a delay in any additional costs to tenants who chose to remain in those ZIP codes after SAFMRs were adopted. Additional administrative costs to PHAs involved those associated with changing software, systems, and staff training. These represented the largest up-front expenditures made by PHAs due to SAFMR implementation. However, these were often one-time costs associated with the revamping of internal systems, and these costs were offset by long-term savings that PHAs would accrue. For instance, SAFMRs reduced administrative costs associated with collecting comparative data to determine rent reasonableness since baseline rents are embedded in SAFMR calculations. SAFMRs also eliminated the need to petition HUD for exception payment standards in many areas where rents exceeded FMRs, which allowed PHAs to reallocate staff resources.

The results from the evaluation of the SAFMR demonstration program provided HUD with guidance for the scaling up of SAFMRs, but they should be interpreted with some important qualifications. For example, with the exception of the two PHAs added to the evaluation from metropolitan Dallas, the other participants in the demonstration program administered SAFMRs in regions where multiple PHAs continued to use traditional metro-wide FMRs in their HCV implementation. Three of these PHAs were in the largest metropolitan areas in the country.[5] In addition, scholars have raised concerns about the representativeness of PHAs in the demonstration program and the generalizability of some of the findings from the evaluation to other PHAs across the United States (NYU Furman Center, 2018; Palm, 2018). In particular, a degree of caution was recommended when applying the results of the evaluation of the demonstration program to metropolitan areas selected for the first phase of the mandatory implementation of HUD's new SAFMR rule, particularly since the selection criteria differed, the rule applied to multiple PHAs on a regional geographic scope,and the rule entails additional tenant protections that different from the demonstration.

5 An example of this was highlighted in a report written by the NYU Furman Center (2018). That report explained how most of the zip codes in the catchment area of the Long Beach Housing Authority fell below FMRs. This reduced the chances of HVC holders making moves to opportunity neighborhoods at the same rate as their peers in other locations participating in the demonstration program. If the entire metropolitan area where Long Beach was situated had also adopted SAFMRs, then additional zip codes with payment standards above FMRs would become more accessible to HCV holders.

The New SAFMR Rule

In November of 2016, HUD published the final version of the new SAFMR rule (Federal Register, 2016). This was followed by a series of technical documents including an implementation guidebook for PHAs that had adopted SAFMRs (U.S. Department of Housing and Urban Development, 2018).[6] The final version of the SAFMR rule included provisions for PHAs mandated to adopt SAFMRs as well as options for their voluntary implementation by other PHAs. In the SAFMR rule's initial implementation in 2018, 23 metropolitan areas were mandated to use SAFMRs when setting payment standards for HCVs. In addition to the 23 metropolitan areas mandated to used SAFMRs, metropolitan Dallas was required to continue to use them under the terms of the 2011 court settlement. Under the provisions of the SAFMR rule, the next opportunity to expand the number of metropolitan areas mandated to use SAFMRs would occur after five years had passed. This meant that in 2018, there were a total of 180 PHAs across the 24 metropolitan areas mandated to use SAFMRs. Those PHAs administered 413,591 vouchers, which accounted for about 19% of all HUD vouchers. Table 2 lists all of the metropolitan areas mandated to use SAFMRs.

Table 2: Metropolitan Areas Mandated to use SAFMRs (N=24)

Metropolitan Area	Total PHAs	Average HCVs Leased Q1 2017	PHAs in MTW Program
Atlanta-Sandy Springs-Roswell, GA	12	41,011	1
Bergen-Passaic, NJ	10	10,881	
Charlotte-Concord-Gastonia, NC-SC	6	8,151	1
Chicago-Joliet-Naperville, IL	13	71,275	1
Colorado Springs, CO	2	2,512	
Dallas, TX	11	29,467	
Fort Lauderdale, FL	6	11,529	
Fort Worth-Arlington, TX	5	12,308	
Gary, IN	3	3,097	
Hartford-West Hartford-East Hartford, CT	21	19,183	
Jackson, MS	2	5,641	
Jacksonville, FL	2	7,250	
Monmouth-Ocean, NJ	9	5,314	
North Port-Sarasota-Bradenton, FL	3	2,773	
Palm Bay-Melbourne-Titusville, FL	3	2,714	
Philadelphia-Camden-Wilmington, PA-NJ-DE-MD	19	37,610	1
Pittsburgh, PA	8	17,087	1
Sacramento-Roseville-Arden-Arcade, CA	4	12,837	
San Antonio-New Braunfels, TX	6	15,095	1
San Diego-Carlsbad, CA	6	28,458	1
Tampa-St. Petersburg-Clearwater, FL	8	19,290	
Urban Honolulu, HI	2	6,040	
Washington-Arlington-Alexandria, DC-VA-MD	14	37,379	2
West Palm Beach-Boca Raton, FL	5	6,689	

Source: U.S. Department of Housing and Urban Development, Voucher Management System (VMS), retrieved by the Poverty & Race and Research Action Council.

6 The delay in implementation from 2016-2018 was caused by a temporary suspension of the rule by HUD in July 2017, followed by litigation that reinstated the rule, which was made effective April 2018.

The SAFMR rule was published in its final form after a period of notice and comment from stakeholders. The changes made to the final rule had implications for the degree to which SAFMRs expanded HCV recipients' access to high-opportunity neighborhoods and the cost effectiveness of voucher implementation. The changes also had implication for which metropolitan areas were selected for mandatory implementation of SAFMRs.

One of the main changes made to the SAFMR final rule was the addition of tenant protections. In the final rule, provisions were included to permit PHAs to hold existing HCV holders harmless if the payment standards in the ZIP code they lived in fell below metropolitan area FMRs. HUD provided PHAs with three options to hold existing tenants harmless during the SAFMR implementation process. First, PHAs were required to delay the reduction in payment standards until the second annual recertification of their rental contract. This would give tenants two years to weigh whether they would move to a different location or remain in their current unit with a lower subsidy. Second, PHAs could develop a schedule to gradually reduce payment standards over a period of time until they were at the new level set using SAFMRs. Third, PHAs had to option to hold tenants harmless indefinitely as long as they remained in their current apartment.

Another noticeable change to the SAFMR rule involved how metropolitan areas were selected for mandatory implementation. Concerns were expressed about the feasibility of SAFMRs in regions with tight rental housing markets. Some of these concerns were supported by analysis in studies like Palm's (2018) which raised questions about replicating outcomes found in low vacancy metropolitan areas like Dallas when using SAFMRs in tighter housing markets like San Francisco and Oakland. In response to these concerns, HUD exempted areas with rental vacancy rates at 4% or less from mandatory adoption of the SAFMR rule.

In addition to these changes, HUD made others that essentially gave relief to PHAs. For instance, HUD exempted all current and future project-based vouchers from mandatory implementation of SAFMRs. This effectively made mandatory implementation of the SAFMR rule only applicable to portable vouchers, giving PHAs more flexibility in the setting of payment standards for properties they managed. Similarly, the final rule exempted PHAs participating in the Moving to work (MTW) program from mandatory implementation of SAFMRs.[7] Moreover, HUD made efforts to address concerns raised about PHAs' about the cost burden associated with the transition to SAFMRs. Although this was not addressed in the final rule per se, HUD offered PHAs up to $25,000 in reimbursements for costs directly related to mandatory SAFMR adoption.

Finally, HUD provides PHAs in non-mandatory SAFMR metropolitan areas with two options to use SAFMRs voluntarily. As noted above, PHAs had the option to set payment standards up to 110% of SAFMRs in individual ZIP codes without going through the more rigorous approval process for exception payment standards. The second option for voluntary adoption of SAFMRs was to request HUD's approval to opt-in and apply SAFMRs metropolitan-wide. This allowed PHAs to both increase payment standards in high-rent ZIP codes

7 Nine of the PHAs in the mandated areas were participants in the Moving to Work (MTW) demonstration program and exempt from the SAFMR rule. These PHAs had the option to voluntarily adopt SAFMRs. MTW was launched in 1996. This program gave participating PHAs flexibility in the administration of HCVs in order to promote economic self-sufficiency and mobility to high-opportunity neighborhoods. A tool used by some PHAs in the MTW program has been the adoption of alternative rent policies in high-opportunity geographic areas. In some instances, PHAs set payment standards in excess of FMRs so that tenants can lease housing in high-opportunity areas. Some PHAs in the MTW program have adopted payment standards for targeted geographic areas in excess of 150% of local FMRs. In 1996, HUD approved 30 PHAs across the country for the MTW demonstration program, and that number grew to 39 by 2012 (U.S. Department of Housing and Urban Development, 2019). The PHAs selected to participate in the MTW demonstration program represent a fraction (1.1%) of all PHAs in the United States. Moreover, most metropolitan areas where a PHA was selected to participate in the MTW program have several other PHAs that were not selected to participate. For instance, The Chicago Housing Authority is a participant in the MTW program, but the other 12 PHAs in that metropolitan area are not. Similarly, the Atlanta Housing Authority is a participant in the MTW program, but the other 11 PHAs in that metropolitan area are not.

and reduce payment standards in low-rent ZIP codes. In essence, PHAs that opted-in for full implementation of SAFMRs would have greater flexibility in pursuing the goal of providing tenants with opportunities to move to high-opportunity areas and garner broader cost savings in HCV administration.

Methodology

The results section of this report is divided into two parts. Part I of the results section focuses on implementation strategies used by PHAs in the 24 metropolitan areas mandated to use SAFMRs when setting payment standards for HCVs. The results presented in this section are based on data collected following the initial implementation of SAFMRs in these jurisdictions during 2018. This is a critical timeframe to examine, since jurisdictions were mandated to have their SAFMR strategy in place by April 2018. The scope and scale of the initial implementation provides one measure of the degree of PHAs' fidelity to the goals of the new SAFMR rule. Attempts were made to collect data from each of the 180 PHAs located in the 24 metropolitan areas mandated to use SAFMRs. Between June and September of 2018, members of the research team contacted individuals responsible for the administration of the HCV program by telephone, email, and mail. Requests were made for each PHA's: SAFMR payment standards, documentation of updates to their administrative plans since SAFMRs were adopted, materials distributed to voucher holders and landlords describing the PHA's SAFMR policies, and the approach adopted to render existing HCV holders harmless during the changeover to SAFMRs. In cases where PHAs did not respond to data requests by telephone, email, and mail, the research team searched for materials on PHAs' websites. At the end of the data collection period, materials were collected from 48% of the PHAs. These materials consisted largely of the SAFMR payment standards that were adopted by the PHAs. To a lesser extent, PHAs provided copies of other materials such as information provided to tenants and landlords about SAFMRs, policies to hold existing HCV holders harmless, and updates to their administrative plans. Although data were only available for 48% of the PHAs, those that did provide data represented the larger service areas in the metropolitan areas mandated to adopt SAFMRs. These PHAs were responsible for the administration of 79% of the 413,591 HCVs issued in the 24 metropolitan areas. PHAs for which data were collected administered an average of 3,801 HCVs, compared to an average of 922 HCVs for PHAs where data were not collected. The data collected also included information for 55% of the 3,881 zip codes contained in those metropolitan areas.

Payment standard data collected from PHAs were aggregated and presented in tabular form. These tables are discussed in the results section and presented in appendices to this report. In addition to payment standard data, other data were collected from PHAs and public documents. Content analysis was used to examine these data following methods described in Silverman and Patterson (2015). The content analysis focused on information provided to tenants and landlords about SAFMRs, the degree to which participants in MTW programs plan to integrate SAFMRs into their HCV implementation strategies, rationales PHAs used in their requests for waivers, and the scope of HUD's monitoring of SAFMR implementation.

Part II of the results section focuses on how PHA administrators in metropolitan areas not mandated to adopt SAFMRs perceive the feasibility of their voluntary adoption. This analysis takes the form of a case study and it is based on in-depth interviews with PHA administrators in the Buffalo, New York metropolitan area. In 2017, HUD's Picture of Subsidized Housing dataset identified 13,463 HCV households in the Buffalo-Cheektowaga-Niagara Falls metropolitan area. In 2017, two PHAs administered 93% of the HCVs in that metropolitan area.[8] The PHAs were both local nonprofit housing organizations under contract to serve the metropolitan area, Belmont Housing Resources of Western New York and the Rental Assistance Corporation of Buffalo. The remaining vouchers were administered by the Buffalo Municipal Housing Authority (BMHA), the City of Niagara Falls, and the Lockport Housing Authority. The vouchers administered by these three agencies were predominantly attached to project-based housing units which are exempt from HUD's SAFMR rule. In-depth interviews were requested with the HCV administrators from each of the nonprofit housing organizations under contract to serve the metropolitan area. In addition to in-depth interviews with the HCV administrators, other data were collected through informal interviews with staff of local housing advocacy organizations and from public documents.

Data analysis for Part II of the results section used ATLAS.ti software to apply open and focused coding techniques described by Silverman and Patterson (2015). The analysis focused on PHA administrators' perceptions of barriers to the voluntary adoption of SAFMRs.

Results

Part I, Analysis of Year 1 Mandatory SAFMR Implementation

This section focuses on implementation strategies used by PHAs in the 24 metropolitan areas mandated to use SAFMRs. The section begins with an overview of how PHAs set payment standards for HCVs during the initial implementation of SAFMRs in 2018. It then examines information provided to tenants and landlords about PHAs' SAFMR policies and approaches adopted to render existing HCV holders harmless. Following this discussion, the report summarizes other topics pertinent to the implementation of the SAFMR rule including: the degree to which participants in MTW programs plan to integrate SAFMRs into HCV implementation, requests for waivers to the SAFMR rule, and the scope of HUD's monitoring of SAFMR implementation.

Payment Standards

Data for payment standards was collected from 86 PHAs in the metropolitan areas mandated to use SAFMRs. These PHAs constituted 48% of all agencies. This group of PHAs administered 79% of the 413,591 HCVs issued in the 24 metropolitan areas. The HCV administered by this group of PHAs covered 55% of the 3,881 ZIP codes in those metropolitan areas.

Under the new rule's guidelines, PHAs can set payment standards between 90% and 110% of SAFMRs. In part, this range allows PHAs to account for local market conditions when adjusting payment standards. For example, in areas where fair market rents are changing rapidly and published SAFMRs are not in line with current trends, the 90%-110% range give PHAs flexibility to address data lag issues. This flexibility may be beneficial in areas experiencing upward pressure on rents due to gentrification, as well as in areas where rents are declining due to deteriorating neighborhood conditions. The 90% to 110% range also give PHAs flexibility to pursue more aggressive strategies to expand renters' access to high-opportunity areas, particularly if they adopted payment standards at 90% in low-rent ZIP codes and payment standards at 110% in high-rent ZIP codes. This approach to

8 In their 2012 study using case management data for portable vouchers, Patterson and Yoo (2012) found that 98% of the total HCVs in Erie County, NY were administered by the two nonprofit PHAs that participated in the study. The remaining 2% of portable HCVs in the county were administered by the BMHA. Their analysis did not include vouchers administered by PHAs in Niagara county, which is adjacent to Erie county. However, there estimates were specific to portable vouchers and did not include project-based vouchers (PBVs).

setting payment standards would incentivize moves to high-opportunity areas since it would tilt the ceiling for subsidies in the manner described by Collinson and Ganong (2014). Tilting the ceiling for subsidies would entail setting subsidies below FMRs in low-rent ZIP codes and setting subsidies above FMRs in high-rent ZIP codes.

While taking these issues into consideration, at minimum, one would expect payment standards to cluster near 100% of published SAFMRs if a PHA had fidelity to the equity goals of the new rule. Under this scenario, a PHA would strike a metropolitan-wide balance between ZIP codes where SAFMRs were less than metropolitan-wide FMRs and ZIP codes where SAFMRs were greater than metropolitan-wide FMRs. This is an important balance to strike, since it generates program cost savings in low-rent ZIP codes while creating disincentives for voucher concentration in low-rent ZIP codes and freeing up resources needed to enhance HCVs in high-rent ZIP codes. Striking this balance is critical to maintaining a PHA's volume of HCVs while expanding housing options in opportunity areas.

…one would expect payment standards to cluster near 100% of published SAFMRs if a PHA had fidelity to the equity goals of the new rule.

If a PHA diverges from payment standards clustering near 100% of published SAFMRs, how payment standards are set can be viewed as an indication of relatively high or low fidelity to the equity goal of the new rule. In instances where there is high fidelity, a PHA would set payment standards in low-rent ZIP codes closer to 90% of SAFMRs while setting payment standards closer to 110% of SAFMRs in high-rent ZIP codes. Setting payment standards in this manner would maximize the incentive for tenants to move to high-opportunity areas while reducing possible overpayments to landlords in low-rent ZIP codes. In contrast, low fidelity would be most pronounced in instances where a PHA sets payment standards in low-rent ZIP codes closer to 110% of SAFMRs while setting payment standards closer to 90% of SAFMRs in high-rent ZIP codes. Setting payment standards in this manner would minimize the incentive for tenants to move to high-opportunity areas while increasing overpayments to landlords in low-rent ZIP codes. This scenario would effectively undercut the equity goal of the SAFMR rule by bringing payment standards back in line with something approximating metropolitan-wide FMRs.

In order to measure this aspect of fidelity to the SAFMR rule, payments standards as a percent of SAFMRs were calculated for each ZIP code in the 24 metropolitan areas. There were a total of 5,501 payment standards reported for SAFMRs by all of the PHAs from which data were collected. It should be noted that in several instances, multiple payment standards were reported for the same ZIP codes. This was because different PHAs in the same metropolitan area often calculated their own unique payment standards for the same ZIP codes. At least one set of payment standards was reported for 2,134 (55%) of the 3,881 ZIP codes in the 24 metropolitan areas. More than one ZIP code was reported in 679 (17.5%) of the cases. The presence of multiple payment standards in the same metro-politan areas can make the HCV process confusing to tenants and landlords. It is also problematic because it makes vouchers less portable, since HCV holders may see a reduction in subsidies if their vouchers are transferred from a PHA with high payment standard to one with lower payment standards in the same metropolitan area. Table 3 summarizes the number of payment standards reported per ZIP code in all of

Table 3: Number and Percent of ZIP Codes where PHAs Reported Payment Standards (N=3,881)

Number of PHAs Reporting Payment Standards	Number of ZIP Codes	Percent of ZIP Codes
0	1,725	45.0
1	1,477	38.1
2	218	5.6
3	213	5.5
4	117	3.0
5	55	1.4
6	55	1.4
7	20	0.5
8	1	0.0

Table 4: Payment Standards as a Percent of SAFMRs (N=5,501)

	0 Bedroom	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
All Payment Standards Reported in the 24 Metropolitan Areas	100.57	100.85	100.58	100.31	100.04
Payment Standards in Low-Opportunity ZIP Codes[1]	102.81	103.02	102.77	102.51	101.94
Payment Standards in High-Opportunity ZIP Codes[2]	98.71	98.09	98.82	98.29	98.13

[1]Low-opportunity ZIP codes = ZIP codes with SAFMR<100% Area FMR
[2]High-opportunity ZIP codes = ZIP codes with SAFMR>=100% Area FMR

the 24 metropolitan areas combined. Tables reporting the number of payment standards per ZIP code for individual metropolitan areas are found in Appendix A.

Table 4 presents payment standards as a percent of SAFMRs in the aggregate for all 24 metropolitan areas. Table 4 also reports payment standards as a percent of SAFMRs above metropolitan-wide FMRs and for SAFMRs below metropolitan-wide FMRs. These data suggest that in the aggregate PHAs in the 24 metropolitan areas had low fidelity to the equity goals of the SAFMR rule. Although average payment standards hovered around 100% of published SAFMRs, there was a divergence between the setting of payment standards in low-opportunity and high-opportunity areas. In low-opportunity areas, payment standards were consistently above 100% of published SAFMRs. In high-opportunity areas payment standards were consistently below 100% of published SAFMRs. This reflected the opposite of the pattern of setting payment standards that would be predicted where PHAs had high fidelity to the equity goals of the SAFMR rule. Setting payment standards in this manner potentially creates disincentives for moves to high-opportunity neighborhoods and reinforces existing patterns of HCV concentration in low-opportunity areas. Moreover, setting payment standards in this manner increases the likelihood that landlords will be overpaid in low-rent areas and PHAs will forego cost-savings that can be used to enhance payment standards in high-opportunity ZIP codes. The reinforces existing geographic patterns of voucher distribution and results in the use of fewer HCVs in high-rent ZIP codes.

…there was a divergence between the setting of payment standards in low-opportunity and high-opportunity areas.

The data presented in Table 4 is in the aggregate. Overall, payment standards tended to be set above 100% of SAFMRs in low-opportunity ZIP codes and below 100% of SAFMRs in high-opportunity ZIP codes. This pattern suggested relatively low fidelity to the SAFMR rule in the aggregate. It is important to note that there was variation in the degree to which payment standards diverged between high-opportunity and low-opportunity ZIP codes in individual metropolitan areas. There were four main trends observed at the metropolitan level. The first was in metropolitan areas where the payment standards followed a similar pattern to the aggregate data reflected in Table 4. Eleven of the 24 metropolitan areas fell into this category. They included the following metropolitan areas mandated to use SAFMRs: Atlanta-Sandy Springs-Roswell, Colorado Springs, Fort Lauderdale, Fort Worth-Arlington, Hartford-West Hartford-East Hartford, Jacksonville, Monmouth-Ocean, Pittsburgh, Sacramento-Roseville-Arden-Arcade, Tampa-St. Petersburg-Clearwater, and Urban Honolulu. Tables reporting payment standards as a percent of SAFMRs in individual metropolitan areas are found in Appendix B.

The second trend in payment standards involved eight metropolitan areas where payment standards were at or above 100% of SAFMRs in both high-opportunity and low-opportunity zips codes. This trend was found in the following metropolitan areas: Charlotte-Concord-Gastonia, Chicago-Joliet-Naperville, Dallas, Gary, Jackson, North Port-Sarasota-Bradenton, Philadelphia-Camden-

Wilmington, and Washington-Arlington-Alexandria. These metropolitan areas exhibited a relatively high degree of fidelity to the equity goals of the SAFMR rule in the sense that they erred on the side of adopting payment standards that were at or higher than 100% of SAFMRs across the board. In some cases, this was justified due to a region's tight rental housing market, but in other metropolitan areas setting payment standards above 100% of SAFMRs raises concerns about potentially overpaying landlords in low-rent areas. The payment standards reported for the Dallas metropolitan area in Table 5 are exemplar of this trend. Tables reporting payment for other metropolitan areas that followed this pattern are found in Appendix B.

The third trend in payment standards involved five metropolitan areas where payment standards were below 100% of SAFMRs in both high-opportunity and low-opportunity zips codes. This trend was found in the following metropolitan areas: Bergen-Passaic, Palm Bay-Melbourne-Titusville, San Antonio-New Braunfels, and San Diego-Carlsbad. These metropolitan areas exhibited a relatively low degree of fidelity to the equity goals of the SAFMR rule in the sense that they adopted payment standards that were below 100% of SAFMRs across the board. This had the effect of encouraging the concentration of HCVs in low-opportunity areas, particularly in metropolitan areas with tightening rental markets. One justification for setting HCVs in this manner might be to stretch a PHA's resources and issue the maximum number of vouchers possible, but this strategy results in placing the greatest constraints on HCV holders who seek to relocate to high-opportunity areas. The payment standards reported for the San Diego-Carlsbad metropolitan area in Table 6 show an extreme

Table 5: Payment Standards as a Percent of SAFMRs for the Dallas, TX Metropolitan Area (N=1,071)

	0 Bedroom	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
All Payment Standards Reported in the Metropolitan Area	103.78	103.13	103.28	103.37	103.25
Payment Standards in Low-Opportunity ZIP Codes[1]	103.41	102.99	102.86	102.91	102.84
Payment Standards in High-Opportunity ZIP Codes[2]	104.11	103.23	103.67	103.8	103.64

[1]Low-opportunity ZIP codes = ZIP codes with SAFMR<100% Area FMR
[2]High-opportunity ZIP codes = ZIP codes with SAFMR>=100% Area FMR

Table 6: Payment Standards as a Percent of SAFMRs for the San Diego-Carlsbad, CA Metropolitan Area (N=169)

	0 Bedroom	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
All Payment Standards Reported in the Metropolitan Area	85.82	86.96	85.77	84.22	80.37
Payment Standards in Low-Opportunity ZIP Codes[1]	89.04	91.13	87.79	88.81	84.36
Payment Standards in High-Opportunity ZIP Codes[2]	84.32	85.01	84.83	81.59	78.50

[1]Low-opportunity ZIP codes = ZIP codes with SAFMR<100% Area FMR
[2]High-opportunity ZIP codes = ZIP codes with SAFMR>=100% Area FMR

example of this trend. Tables reporting payment standards for other metropolitan areas that followed this pattern are found in Appendix B.

Finally, the SAFMR rule allows PHAs to "tier" payment standards. The use of tiers involves setting a single payment standard for a group of ZIP codes in an effort to simplify the HCV implementation process.[9] Tiering payment standards was common in the 24 metropolitan areas mandated to use SAFMRs. Tiers were adopted by 53% of the PHAs where data were collected and at least one PHA adopted them in 22 (92%) of the 24 metropolitan areas. On the surface, applying tiers presents HCV holders with a more discrete list of payment standards to reference when searching for housing. However, if applied with low fidelity to the equity goals of the SAFMR rule, this approach may result in more limited access to high-opportunity areas and reproduce patterns of HCV concentration. Table 7 provides an example of this outcome. This table summarizes average payment standards across the five tiers set by the Hawaii Public Housing Authority for the 57 ZIP codes in its service area, which encompasses the entire Urban Honolulu metropolitan area. Table 7 provides a summary of the divergence between payment standards in low to high rent tiers. Tier 5 represented the lowest rent ZIP codes in the metropolitan area, rents incrementally increased until the highest rents were found in tier 1. The data summarized in Table 7 shows that there was an inverse relationship between rents and payment standards as a percent of SAFMRs.

The example of tiering in the Urban Honolulu metropolitan area illustrates how low fidelity can undercut the equity goals of the SAFMR rule when the use of SAFMRs is mandated. In metropolitan areas where all PHAs are not required to use SAFMRs, tiering can have more noticeable effects. Table 8 summarizes average exception payment standards set across the three tiers set by the San Diego Housing Commission for the 33 ZIP codes in its service area.[10] Although this PHA is located in a mandatory SAFMR area, it is exempt from the SAFMR rule because it is a participant in the MTW program.[11] This means that the San Diego Housing Commission was able to set its payment standards without the constraints of the SAFMR rule. The PHA's tiering showed a similar inverse relationship between rents and payment standards. However, without the safeguards built into the SAFMR rule, average payment standards as a percent of SAFMRs fell below the 90% threshold in high-opportunity areas.

Table 7: Average Payment Standards as a Percent of SAFMRs for the Hawaii Public Housing Authority (N=57)

	0 Bedroom	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Tier 5 - Lowest Rent ZIP Codes - (N=4)	109.77	109.40	109.40	109.48	109.65
Tier 4 (N=40)	101.74	101.43	102.05	101.76	101.99
Tier 3 (N=10)	98.55	98.65	98.65	98.80	98.73
Tier 2 (N=2)	90.00	90.00	90.00	90.00	90.00
Tier 1 - Highest Rent ZIP Code - (N=1)	90.00	90.00	90.00	90.00	90.11

9 Note, however, that tiering may actually create more work, because annual re-calculations are required to keep pace with year to year SAFMR adjustments.

10 The San Diego Housing Commission based it tiers on zip code boundaries making it possible to directly compare payment standards set by this PHA to others in the metropolitan area using zip code based SAFMRs. This type of comparison was not possible with MTW participants that used different geographies when setting their exception payment standards.

11 MTW agencies in mandatory SAFMR regions may seek exemption from the SAFMR rule if they have "alternative rent policies" as part of their MTW Agreement with HUD.

Table 8: Average Payment Standards as a Percent of SAFMRs for the San Diego Housing Commission (N=33)

	0 Bedroom	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
Tier of Low Rent ZIP Codes (N=10)	96.77	96.50	96.47	96.48	85.20
Tier of Moderate Rent ZIP Codes (N=8)	82.97	82.73	82.54	82.65	72.86
Tier of High Rent ZIP Codes (N=15)	80.85	80.32	80.42	76.75	72.70

Holding Tenants Harmless

The final SAFMR rule permitted PHAs to hold existing HCV holders living in low-rent areas harmless as the old FMRs were phased out during the SAFMR implementation process. PHAs had three options to do this: they could delay the reduction in payment standards until the second annual recertification of their rental contract (required), they could develop a schedule to gradually reduce payment standards over a period of time, or they could hold tenants in their current apartments harmless indefinitely. It is important to stress that the option to hold tenants harmless only applied to existing HCV contract holders. Payment standards based on SAFMRs would be applied to new recipients of HCVs at the time they originated.[12]

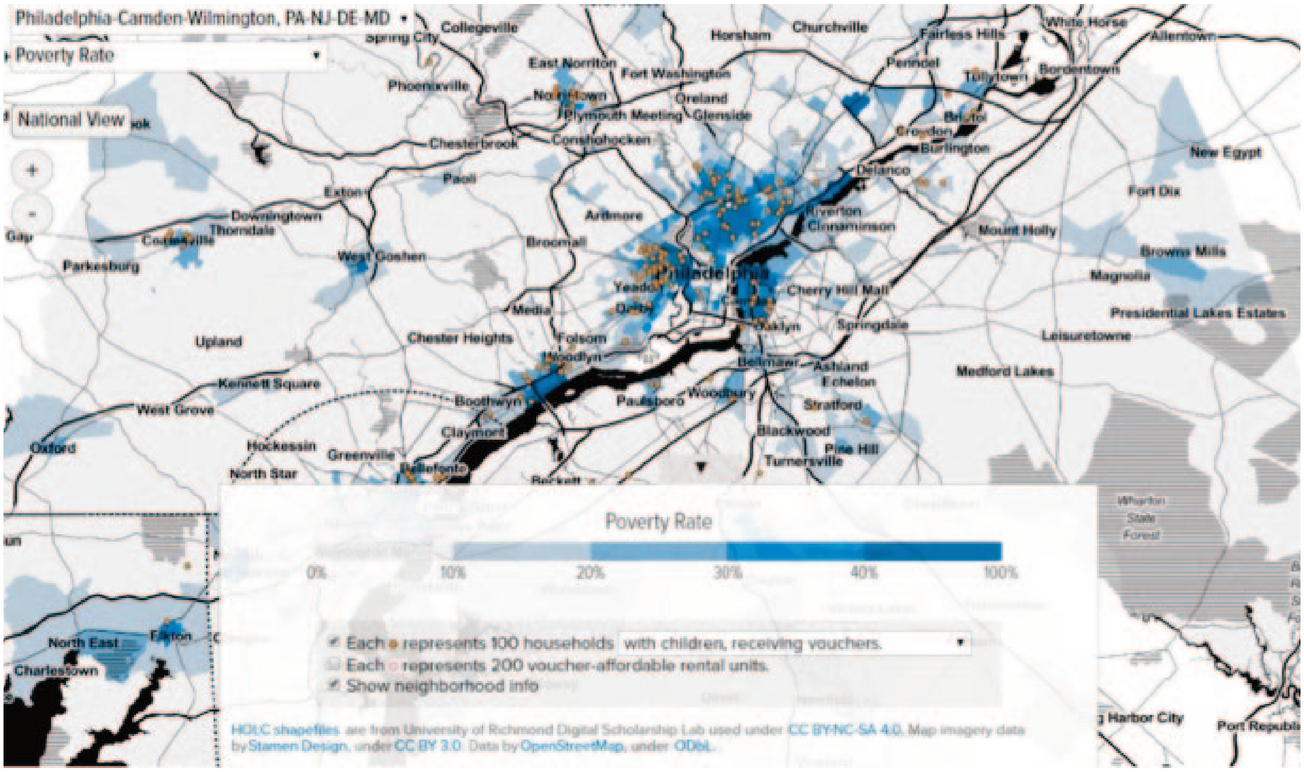
Tenant and landlord notification materials were used in the analysis to identify what option for holding tenants harmless was adopted by PHAs. Tenant notification materials were provided by 22 PHAs. Landlord notification materials were provided by 12 PHAs. These materials were analyzed using content analysis. Findings from the analysis indicated that the thrust of tenant notifications was to alert tenants that they would be held harmless if payment standards were reduced in their area due to the adoption of SAFMRs. The discussion of SAFMR equity goals was secondary. In 11 of the letters analyzed, PHAs indicated that tenants would be held harmless until their second annual recertification took place. Similar language was included in most of the notifications that landlords received from these PHAs. The option to hold tenants harmless until their second annual recertification occurred was the only option explicitly mentioned in the materials analyzed.

■ In addition to notifying tenants that SAFMRs were being adopted and that this may impact their level rental assistance in the future, nine PHAs also included language explaining the equity goals of the new policy. ■

In addition to notifying tenants that SAFMRs were being adopted and that this may impact their level rental assistance in the future, nine PHAs also included language explaining the equity goals of the new policy. For example, the Sacramento Housing and Redevelopment Agency's notification explained that, "with the SAFMRs you will be able to use your voucher in more places than would have been possible before – including neighborhoods that have high-performing schools, reduced crime, access to grocery stores, parks, medical facilities, child care, transportation, and other amenities." Similar language was found in six of the notices that went to landlords.

One contrast stood out in the materials circulated to tenants and landlords. Landlords received more detailed information about how payment standards were set by the PHAs. In four of the landlord notifications, tables showing the payment standards were included. This level of detail was absent from materials circulated to tenants. In addition to this contrast, the letters to landlords provided insights about the degree to which PHAs had fidelity to the

12 An additional tenant protection in the rule, applicable to both new and existing tenants, limits the annual drop in payment standards from FMR to SAFMR in a low rent neighborhood to 10%.



SAFMR rule. For instance, the Cecil County Housing Authority informed landlords that most of its service area will have payment standards reduced, making it "more difficult for some tenants to rent your higher cost units, more difficult for you to get higher rents for some units, and more difficult for us to lease voucher holders in some areas." This PHA is located in the Philadelphia-Camden-Wilmington metropolitan area, and 88% of the 16 ZIP codes in its service area had SAFMRs below FMRs. This notification went on to describe how the PHA tiered its payment standards to buffer landlords from potential reductions in payment standards due to the use of SAFMRs. The PHA's letter to landlords said, "in an effort to minimize the disturbance to your operations, limit our administrative burden, and maintain as much simplicity as possible for the tenants—while also attempting to adhere to the spirit and intention of the SAFMR program—using local authority we have reduced the 16 standards to 3 different rate areas." An examination of the FMRs, SAFMRs, and tiers adopted by this PHA indicated the effect of the tiers adopted by this PHA was to adjust payment standards upward in low-rent areas and downward in high-rent areas. Payment standard reductions using the PHA's tiers were about one-third to one-half of what they would have been if posted SAFMRs were adopted without making these adjustments.

PHAs in the MTW Program and Others Requesting Waivers

Nine PHAs located in the 24 metropolitan areas mandated to use SAFMRs were participants in the MTW program. These PHAs included the: Atlanta Housing Authority, Charlotte Housing Authority, Chicago Housing Authority, District of Columbia Housing Authority, Fairfax County Redevelopment and Housing Authority, Philadelphia Housing Authority, Housing Authority of Pittsburgh, San Antonio Housing Authority, and San Diego Housing Commission. These PHA's were generally exempt from the mandate to use SAFMRs, if they adopted alternative rent policies in their MTW plans. Instead, they developed exception payment standards using more flexible criteria based on metropolitan-wide FMRs. When the

Nine PHA's located in the 24 metropolitan areas mandated to use SAFMRs were participants in the MTW program.

SAFMR rule was published, all of the MTW participants exercised their exemption from the mandated adoption of the rule. Some MTW participants, like the Philadelphia Housing Authority, indicated that they would consider transitioning to SAFMRs after feedback about its implementation in other PHAs was available.

Some MTW participants, like the Chicago Housing Authority and the Fairfax County Redevelopment and Housing Authority, argued that their use of exception payment standards based on FMRs was more effective than SAFMRs. According to this argument, the use of SAFMRs would raise payment standards in all high rent areas and increase a PHA's costs per voucher without additional funding from HUD. This would mean that PHAs could issue fewer HCVs. It was also argued that SAFMRs would lower payment standard in low rent areas and increase housing costs for HCV holders who remained in them. Consequently, MTW participants exercised their exemption from the SAFMR rule in favor of the use of exception payment standards in a more discrete set of geographic areas.

■ Some MTW participants… argued that their use of exception payment standards based on FMRs was more effective than SAFMRs. ■

Despite their exemption from the SAFMR rule, some MTW participants, like the San Antonio Housing Authority, Pittsburgh Housing Authority, and the San Diego Housing Commission, set HCV subsidies based on exception payment standards applied to ZIP codes (as opposed to other geographies like census tracts or locally demarcated neighborhood boundaries). This represented a partial transition to the ZIP code model adopted in the SAFMR rule, but it remained anchored in metropolitan-wide FMRs.

Although MTW participants were able to exercise their right to be exempt from the SAFMR rule, requests by other PHAs based on similar concerns were not granted waivers. For example, the two PHAs in the Urban Honolulu metropolitan area requested a waiver from the SAFMR rule and were denied. Their request was for a permanent waiver. Other PHAs had greater success in obtaining extensions to the deadline for implementation, citing issues related to administrative obstacles to implementing SAFMRs on-time. PHAs that requested temporary waivers of three months to one year in order to make the transition to SAFMRs more seamlessly were typically granted extensions (Federal Register, 2018).

HUD's Monitoring of SAFMR Implementation

In addition to issues related to the setting of payment standards, holding tenants harmless, and the parallel administration of the MTW program in mandatory SAFMR areas, the analysis found that the implementation of the SAFMR rule was hampered by a lack of proactive monitoring by HUD. For example, PHAs are not required to submit their administrative plans, payment standards, or materials used to notify tenants and landlords about their internal implementation policies related to the SAFMR rule to HUD. Instead, they are expected to keep these records in-house and available if HUD requests to inspect them. This is problematic, since there is no central repository where these materials are stored and made publically available for inspection. Instead, information must be gathered from individual PHAs. This impedes public interest and advocacy groups from accessing information about the implementation of the SAFMR rule and shifts the burden of public disclosure from HUD to members of the general public. The lack of a public repository for implementation materials also hinders the free flow of information between PHAs interested in identifying best practices to adopt when planning their implementation strategies.

■ There is no central repository where these materials are stored and made publically available for inspection. Instead, information must be gathered from individual PHAs. ■

Part II, Analysis of PHA Perceptions of the Voluntary Adoption of SAFMR

This section focuses on how PHA administrators in metropolitan areas not mandated to adopt SAFMRs perceive the feasibility of voluntarily adoption. This analysis is based on a case study of PHAs in the Buffalo, New York metropolitan area. In 2017, five PHAs administer 13,463 HCVs in the metropolitan Buffalo area. Two PHAs that administer the majority of the HCVs in the metropolitan area (approx. 93%) participated in in-depth interviews, other data were collected through informal interviews with staff in local housing advocacy organizations and from public documents.

Buffalo was selected for this case study because it is a medium-sized metropolitan area with a sizable population of HCV eligible renters living in concentrated poverty. According to the 2017 ACS five year estimates, the Buffalo-Cheektowaga-Niagara Falls metropolitan area had a population of 1,136,670. In terms of race and ethnicity, the population was 77.8% non-Hispanic white and 11.9% non-Hispanic black, and 4.7% Hispanic. The metropolitan area had a 14.6% poverty rate, and 24.5% of its 474,349 households were housing cost burdened.[13] In contrast, the city of Buffalo, the area's core city had a population of 259,574. In terms of race and ethnicity, the population was 44% non-Hispanic white and 36.3% non-Hispanic black, and 11.3% Hispanic. The city had a 30.9% poverty rate, and 35.7% of its 110,636 households were housing cost burdened.

According to HUD's Picture of Subsidized Housing database, there were 13,463 vouchers in the Buffalo-Cheektowaga-Niagara Falls metropolitan area in 2017 and 8,546 (63.5%) were used in the city of Buffalo. HCV holders were 85% minority in the city compared to 53% in the rest of the metropolitan area. In the city, 68% of HCVs were concentrated in minority tracts, while only 19% were concentrated in these tracts in the rest of the metropolitan area. Similarly, 35% of the city's vouchers were concentrated in poverty tracts, while only 19% were concentrated in these tracts in the rest of the metropolitan area. The concentration of vouchers was acute among families with children. A recent study by Mazzara and Knudsen (2019) found that 61% of the voucher-assisted families with children in the Buffalo metropolitan area lived in high-poverty neighborhoods. This was the highest rate of concentration among families with children across the 50 largest metropolitan areas in the country.

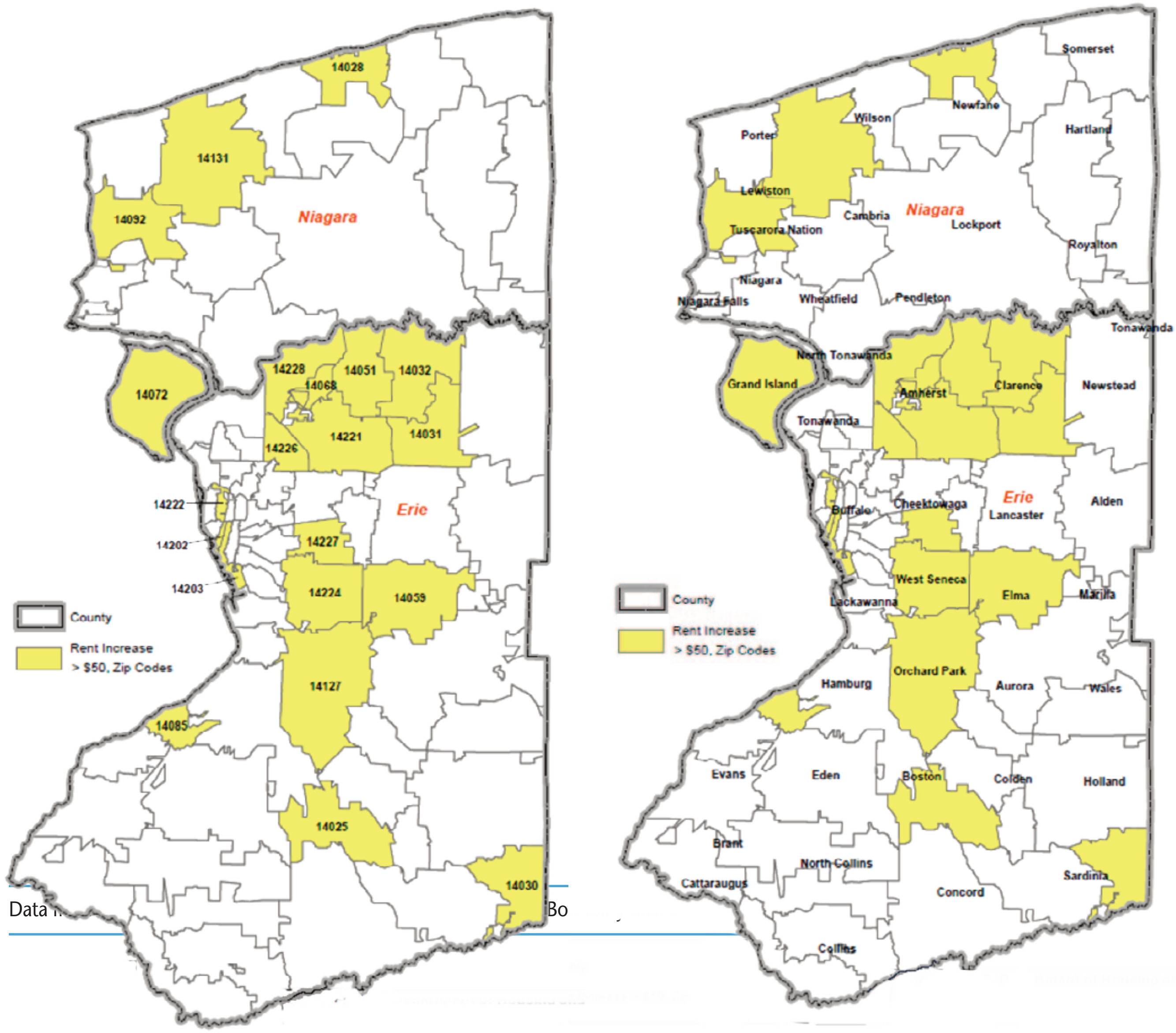
A comparison of 2018 FMRs and SAFMRs was done for the Buffalo-Cheektowaga-Niagara Falls metropolitan area. Across the 97 ZIP codes in the area, SAFMRs as a percent of metropolitan-wide FMRs were calculated for 0-4 bedroom units. The average for all unit sizes was then calculated for each ZIP code. The results from these calculations are found in Appendix C. These calculations indicated that if SAFMRs were adopted in the Buffalo-Cheektowaga-Niagara Falls metropolitan area, payment standards would increase in 16 (16%) ZIP codes and they would decrease in 81 (84%) ZIP codes. Payment standard decreases would disproportionately impact the city of Buffalo where 19 (90%) of its 21 ZIP codes would see reduced payment standards under the SAFMR rule. The two ZIP codes in the city of Buffalo that would have increased payment standards using SAFMRs were 14222 and 14203 which encompass the Elmwood neighborhood and downtown. The Elmwood neighborhood is widely known as a gentrified area in the city, and downtown has become a magnet for investment in market rate rental housing (Partnership for the Public Good, 2017; DeCarlo, 2018; Glynn, 2018). In contrast, payment standard decreases would impact 62 (82%) of the 76 ZIP codes in the rest of the metropolitan area under the SAFMR rule. The 14 (18%) ZIP codes outside of the city that would have increased payment standards using SAFMRs were located in relatively more affluent suburbs.

Resistance to SAFMRs

During interviews, PHA administrators expressed reluctance to adopt SAFMRs. This reluctance was

13 Households with housing costs more than 30% of household income are considered housing cost burdened.

Zip Codes with Rent Increases over $50, 2018 2BR FMR to SAFMR
Buffalo-Cheektowaga-Niagara Falls, NY, MSA



rooted in three general concerns. PHA administrators believed that: administering SAFMRs would be too costly, tenants and landlords would find SAFMRs too confusing, and that it was unnecessary to adopt SAFMRs since current PHA practices were already accomplishing the mobility goals of the new HUD rule.

The perception that SAFMRs would be too costly. One of the main objections PHA administrators had to adopting SAFMRs was that it would be an administrative burden and cost prohibitive. Many of the issues that were associated with this focused on the short-term costs of transitioning to SAFMRs. These costs included training staff, developing educational materials for tenants and landlords, and changing software used to implement the HCV program. In addition to these short-term costs, the PHA administrators also indicated that, in the short-term, the cost of holding tenants harmless would be prohibitive. One PHA administrator made this point about the perceived costs of holding tenants harmless:

> Because you have to hold somebody harmless for at least one year, a full cycle in reducing their payment standard, you're gonna see a large uptick in units in the higher end. That's going to increase your per unit cost for those units. The other ones, where you're saying okay we're reducing the payment standard for the people that already are being assisted on the program, we would have to wait a full year before we saw that decrease in those per unit costs. So overall, during the first year of implementing it, your per unit cost is going to increase thereby reducing the number of total vouchers you can utilize.

The PHA administrators argued that the costs of transitioning to SAFMRs were a substantial obstacle. Although they acknowledged that these were short-term costs and that HUD offered grants to assist PHAs making the transition to SAFMRs, they were still perceived to represent a prohibitive burden. In addition to short-term costs, the PHA administrators believed that some new costs would be ongoing. There was a perception that annual changes in SAFMRs would require PHAs to recalibrate payment standards more often and that this would be cumbersome since there would be multiple payment standards to calculate at the ZIP code level. Moreover, the PHA administrators argued that using SAFMRs would result in more human error when administering the HCV program.

One PHA administrator explained the issue of human error in these terms:

> The more factors that go into determining the amount of assistance someone receives, the more opportunity there is for human error. The more errors, the more time and energy spent on correcting those errors. So you're going to have more payment standards. You're going to look at more and more payment standards which means that every time that information is being entered in you have to take more caution on making sure that you're selecting the correct payment standard.

In essence, this PHA administrator was concerned that staff might apply the wrong payment standard when entering data into the PHA's case management system for a tenant. Of course proper training protocols can be adopted to reduce the risk of this type of human error, and as the PHA administrator acknowledged, "there are some ways to get around that a little bit with software."[14]

PHA administrators believed that tenants and landlords would find SAFMRs confusing.

The perception that tenants and landlords would find SAFMRs too confusing. In addition to concerns about the costs associated with SAFMRs, the PHA administrators believed that tenants and landlords would find SAFMRs confusing. In terms of tenants, the main concern was that explaining multiple payment standards would add to the workload of PHA administrators. One administrator put it this way:

> If you switch to using SAFMRs you would have several layers of payment standards. So to be able to explain to a client, "if you were to move to these five areas you would be able to get this much assistance, if you moved to these three areas it would be this." So having to explain that and make it understandable to the clients can be very difficult.

In part, explaining how payment standards change by ZIP code would add time to the tenant counseling process. More broadly, this activity would entail more detailed descriptions of the mobility goals of the SAFMR rule. Of course, this cost can also be seen as worthwhile. As a staff member of a local housing advocacy organization suggested in an informal interview, adding more discussion of mobility goals during the tenant

14 For example, simply entering the zip code and bedroom size of a unit should be sufficient to quickly generate the SAFMR payment standard for that unit.

counseling process would help address shortcomings in the existing case management and tenant education process.

In terms of landlords, the PHA administrators cited additional sources of confusion. One of the main sources of confusion was anticipated from landlords who owned property in multiple ZIP codes. One PHA administrator described the confusion that SAFMRs would pose to these landlords in this way:

> Landlords who have units that cross over multiple ZIP codes, which is very common. I think they may be confused because you might have somebody who's in 14203 who might be a little bit higher, versus 14201. Now you're like, "wait a minute, you just gave me this much for this family. You know, just down the road. Maybe, however many miles, ten miles. Now you're telling me you're only going to give me this much." I think it would be beneficial, but I also think it might be harmful as well.

This concern highlights that PHAs would need to develop educational materials for landlords to alert them that SAFMRs are used to make payment standards more reflective of market rate rents at the ZIP code level. There were also concerns that landlords would no longer participate in the HCV program if SAFMRs resulted in lower payment standards. However, this concern is based on the assumption that landlords could set their rents above the market rate in areas with lower SAFMRs and still find tenants willing to pay those elevated rents.

The perception that current PHA practices were already accomplishing the mobility goals of the SAFMR rule. Finally, PHA administrators believed that using SAFMRs was unnecessary since they had already adopted strategies for setting payment standards based on FMRs that achieved the mobility goals of the new HUD rule. Both PHA administrators described how their agencies had adopted two-tiered payment standards. In both cases, payment standards were set in a first tier just above 100% of FMRs for most ZIP codes, and a second tier of payment standards was set just below 110% of FMRs. For one PHA, a small group of ZIP codes was placed in the second tier of payment standards if poverty rates were below 10%. For the other PHA, a small group of ZIP codes was placed in the second tier of payment standards if SAFMRs were above FMRs. The PHA administrators believed they were "ahead of the curve" and that by adopting two-tiered payment standards they had created their "own type of SAFMRs before the rule ever came out."

However, the two-tiered approach adopted by the PHAs fell short of achieving the goals of the SAFMR rule in two respects. First, the PHAs were simply setting payment standards within the 90%-110% range of FMRs allowed by HUD. In order to set payment standards higher than 110% of FMRs, the PHAs would have to get approval from HUD to adopt exception payment standards.[15] Although the second tier of payment standards was designed to promote mobility, in half of the ZIP codes where SAFMRs are higher than FMRs (see Appendix C) they exceed FMRs by more than 110%. Consequently, the two-tiered system based on FMRs that was adopted by the PHAs in Buffalo did not create the same magnitude of incentives that adopting SAFMRs in high-rent ZIP codes would. Second, the two-tiered system adopted by the PHAs does not lower payment standards in the vast majority of ZIP codes where SAFMRs are below 100% of FMRs. Instead, payment standards in theses ZIP codes were actually set above 100% of FMRs. In essence, the two-tiered system adopted by the PHAs forgoes any accrual of cost savings in low-rent areas that SAFMRs offer to PHAs.

15 Ironically, both PHA administrators referred to their second tier of payment standards as "exception payment standards," when counseling tenants and negotiation with landlords. However, they purposefully set payment standards below 110% of FMRs to avoid having to seek HUD approval for what HUD defines as an "exception payment standard." By adopting this language, the PHAs have inadvertently created confusion for tenants, landlords, any administrators from HUD engaged in oversight, and for housing advocates examining local PHA practices. In reality, PHAs in the Buffalo metropolitan area do not use exception payment standards and they should refrain from referring to the second tier of payment standards used in their HCV program in this manner.

Less Imposing Barriers to SAFMRs

At least in the case of Buffalo, other potential barriers to the use of SAFMRs were not viewed to be overly imposing. For instance, the use of different payment standards across PHAs was not viewed as overly problematic. The PHA administrators acknowledged that the HCV allocations each agency received from HUD varied, so payment standards diverged across agencies. However, since there were only three PHAs administering the HCV program in the area, this divergence was manageable. In part, this divergence was addressed through informal collaboration that took place across the agencies. As one PHA administrator put it:

> Once the FMRs come out, there's emails going back and forth between the three of us. You know, "what are your plans for payment standards? What are you looking at? Here's what we're planning." We kind of try to get as close to being the same as possible. You can't just say "Okay, we'll all agree these are the payment standards and move forward," because one agency might be able to afford an increase in payment standards where another agency may not.

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The presence of a working relationship between the PHAs facilitated the sharing of information. Collaboration was also mentioned in other areas, like efforts to pursue mobility counseling. In an informal interview, a staff member at a local advocacy organization said her organization did monthly presentations to the PHAs on fair housing and mobility programs. These types of interactions can serve as building blocks for expanded collaboration across PHAs.

Similarly, the PHAs were relatively insulated from political pressures to reject SAFMRs. Both of the PHAs that were interviewed were under contract to administer the HCV program for local municipalities. One was under contract from the City of Buffalo and the other was under contract from a consortium of suburban municipalities. Both indicated that they had autonomy in: the administration of the HCV program, making decisions about how to set payment standards, and whether to use FMRs or SAFMRs. A staff member at a local advocacy organization expressed cautious optimism. Although the City of Buffalo had been a source of resistance in areas related to fair housing in the past, it was believed that if there was, "one strong individual at one of the PHAs who said 'wait a minute, what we have isn't working,'" policies could change.

Recommendations for HUD

The results presented in this report highlight how the successful implementation of SAFMRs hinges on the degree to which PHA administrators show fidelity to the equity goals of the SAFMR rule. These goals focus on setting payment standards that provide HCV holders with greater chances to move to high-opportunity neighborhoods. To forward these goals, the SAFMR rule outlines a two-pronged strategy for PHA administrators to follow when setting payment standards. SAFMRs are used so payment standards are maximized in high-rent areas and payment standards are minimized in low-rent areas. This two-pronged strategy creates an incentive structure that enables moves to high-opportunity neighborhoods, and removes incentives to move to or stay in low rent, lower opportunity neighborhoods. Importantly, the reduction of payment standards in low-rent areas provides PHAs with the cost savings needed to pay for higher payment standards in high-rent areas. The reduction in payment standards in low-rent areas also corrects for the tendency to overpay landlords when FMRs are used. In essence, payment standards based on SAFMRs bring HCV subsidies in line with market based rents across a metropolitan area.

■ *Successful implementation of SAFMRs hinges on the degree to which PHA administrators show fidelity to the equity goals of the SAFMR rule.* ■

The results presented in this report indicate that PHA administrators lack high fidelity to the equity goals of the SAFMR rule. This has led to less than optimal implementation in the 24 metropolitan areas required to use SAFMRs and a reluctance for other PHAs to voluntarily adopt SAFMRs. Despite these findings, there are signs that once PHAs gain experience in the use of SAFMRs they apply the policy with greater efficacy. For instance, all but one of the PHAs that participated in the SAFMR demonstration program continue to use them well beyond the end of that program.[16] Likewise, some of the highest levels of fidelity to SAFMRs were found in the place with the most experience using them to set payment standards, the Dallas metropolitan area. Still, there is a need to fine tune the SAFMR rule in anticipation of the scheduled addition of metropolitan areas mandated to adopt it. The expansion of mandatory SAFMR metropolitan areas is scheduled to occur in the fifth year of the new rule's implementation. Fine tuning the SAFMR rule would allow for a more rapid scaling up to occur. Ideally, this would encompass the full implementation of the SAFMR rule nationally – though with strong protections in areas with very low vacancy rates. With that goal in mind, recommendations are made to three target audiences: administrators within HUD, local PHAs that implement HCV programs, and applied researchers and policy advocates.

Recommendations from the Analysis of PHAs Mandated to Use SAFMRs

Increase HUD's emphasis on the Equity Goals of SAFMRs. Successful implementation of SAFMRs hinges on PHA administrators' fidelity to the equity goals of the SAFMR rule. To foster this commitment to promoting HCV holders' mobility, HUD must invest more resources in educating PHAs, tenants, and landlords about these goals and their relationship to the setting of payment standards in high-rent and low-rent areas. In addition, the focus on the equity goals of using SAFMRs to set payment standards should be given greater emphasis in the tenant notification process. Materials circulated during the tenant notification process should include materials about the availability of housing units and neighborhood amenities in high opportunity neighborhoods.

■ HUD must invest more resources in educating PHAs, tenants, and landlords about these goals and their relationship to the setting of payment standards in high-rent and low-rent areas. ■

Strengthen guidelines for setting payment standards. HUD needs to strengthen the guidelines for setting payment standards so they are in line with the equity goals of the SAFMR rule, which includes the goals of enhancing the cost effectiveness of SAFMRs. These guidelines should be more explicit about the need to lower payment standards in low-rent areas and to increase payment standards in high-rent areas. Revised guidelines should emphasize setting payment standards in a manner that tilts the ceiling for subsidies as described by Collinson and Ganong (2014). In other words, guidelines should encourage PHAs to set subsidies at 90% of SAFMRs in low-rent ZIP codes and set subsidies at 110% of SAFMRs in high-rent ZIP codes. These types of guidelines can be reinforced with incentives to PHAs, such as awarding additional vouchers and funding for mobility counseling to PHAs that adopt this strategy.

Require more metropolitan-wide collaboration. To curb the practice of individual PHAs setting multiple payment standards in the same zip-codes, HUD should encourage more metropolitan-wide collaboration across PHAs. Setting uniform payment standards in a metropolitan-area will have two main benefits. First, uniform payment standards will reduce confusion for renters and provide landlords with a more predictable environment. Second, uniform payment standards will enhance the portability of vouchers and reduce the chances that tenants and landlords are penalized when a voucher is transferred from one PHA to another. Metropolitan-wide collaboration can be encouraged with incentives to PHAs, such as awarding additional vouchers, funding for mobility counseling, and technical support to PHAs that join consortia and set uniform payment standards.

■ To curb the practice of individual PHAs setting multiple payment standards in the same zip-codes, HUD should encourage more metropolitan-wide collaboration across PHAs. ■

Scrutinize PHAs that tier payment standards. HUD should establish a set of criteria for tiering payment standards that conforms to the equity goals of the SAFMR rule. As a general rule, tiering payment standards should be discouraged unless PHAs can demonstrate that this approach is more effective at promoting moves to high-opportunity ZIP codes across a metropolitan area than setting distinct payment standards for every ZIP code in a PHA's service area.

Clarify the purpose of holding tenants harmless. HUD should clarify its policy on holding tenants harmless. Communications with PHAs should highlight that the holding tenants harmless policy relates exclusively to current HCV holders during the phase-in period for SAFMRs. Clarification is needed so PHAs do not misinterpret this policy in ways that lead to increasing payment standards in low-rent areas across the board in order to protect landlords. HUD should clarify that this policy was not designed to hold new HCV holders and landlords harmless. It only applies to current HCV holders during the SAFMR phase-in period.

Transition MTW participants to SAFMRs. HUD should increase dialog with MTW participants about strategies to transition to SAFMRs. This dialogue should focus on encouraging MTW participants to adopt SAFMRs and accrue cost savings that can allow them to expand the geographic scope of high-opportunity areas that they target. As part of this dialogue, HUD should place added scrutiny on requests by MTW participants to be exempt from the SAFMR rule and require PHAs to demonstrate that alternative rent structures would produce better housing outcomes than SAFMRs.

Increase HUD's monitoring and reporting requirements. HUD should increase its monitoring and reporting requirements for implementation of the SAFMR rule. Under its current administrative practices, PHAs are not required to submit their administrative plans, payment standards, or materials used to notify tenants and landlords about their internal implementation policies related to the SAFMR rule to HUD. A central repository needs to be created where these materials are stored and made publically available for inspection. This repository can be used as a resource: by HUD when monitoring the implementation of the SAFMR rule, by public interest and advocacy groups, by PHAs interested in identifying best practices, and by the general public. This repository can be modeled after the one maintained on HUD's website for the MTW program.[17]

Recommendations from the Analysis of PHAs with the Option to Voluntarily Implement SAFMRs

Increase funding to cover the costs of transitioning to SAFMRs. HUD should increase funding to support the transition to SAFMRs in two key areas. First, funds to cover the costs of training staff, developing educational materials for tenants and landlords, and upgrading software and other administrative systems should be enhanced. In conjunction with these enhanced funds, HUD should expand existing protocols and materials to assist PHAs in their training and education activities. Second, HUD should reimburse PHAs for the costs of holding tenants harmless during the transition to SAFMRs, so payment standards can be raised in high-rent areas without reducing the overall number of vouchers.

Augment resources for education and mobility counseling. HUD should set aside more resources for tenant, landlord, and PHA education, as well as mobility counseling.[18] PHAs that use SAFMRs should be prioritized for these resources, since this type of intervention is integral to actualizing the equity goals of the SAFMR rule.

17 HUD maintains an electronic repository of annual plans and other documents for the MTW program at the following website: https://www.hud.gov/program_offices/public_indian_housing/programs/ph/mtw/mtwsites .

18 For example, Congress recently appropriated $25 million in funds for a Regional Housing Mobility Demonstration in the 2019 budget

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Appendix A

Number and Percent of ZIP Codes where PHAs Reported Payment Standards

Table A1: Number and Percent of ZIP Codes where PHAs Reported Payment Standards (N=285) in Atlanta-Sandy Springs-Roswell, GA

Number of PHAs Reporting Payment Standards	Number of ZIP Codes	Percent of ZIP Codes
0	166	58.2
1	63	22.1
2	46	16.1
3	10	3.5

Table A2: Number and Percent of ZIP Codes where PHAs Reported Payment Standards (N=113) in Bergen-Passaic, NJ

Number of PHAs Reporting Payment Standards	Number of ZIP Codes	Percent of ZIP Codes
0	32	28.3
1	58	51.3
2	23	20.4

Table A3: Number and Percent of ZIP Codes where PHAs Reported Payment Standards (N=119) in Charlotte-Concord-Gastonia, NC-SC

Number of PHAs Reporting Payment Standards	Number of ZIP Codes	Percent of ZIP Codes
0	110	92.4
1	9	7.6

Table A4: Number and Percent of ZIP Codes where PHAs Reported Payment Standards (N=341) in Chicago-Joliet-Naperville, IL

Number of PHAs Reporting Payment Standards	Number of ZIP Codes	Percent of ZIP Codes
0	161	47.2
1	176	51.6
2	4	1.2

Table A5: Number and Percent of ZIP Codes where PHAs Reported Payment Standards (N=60) in Colorado Springs, CO

Number of PHAs Reporting Payment Standards	Number of ZIP Codes	Percent of ZIP Codes
0	1	1.7
1	59	98.3

Table A6: Number and Percent of ZIP Codes where PHAs Reported Payment Standards (N=242) in Dallas, TX

Number of PHAs Reporting Payment Standards	Number of ZIP Codes	Percent of ZIP Codes
0	1	0.4
1	15	6.2
2	15	6.2
3	49	20.2
4	36	14.9
5	52	21.5
6	53	21.9
7	20	8.3
8	1	0.4

Table A7: Number and Percent of ZIP Codes where PHAs Reported Payment Standards (N=80), in Fort Lauderdale, FL

Number of PHAs Reporting Payment Standards	Number of ZIP Codes	Percent of ZIP Codes
3	2	2.5
4	77	96.3
5	1	1.3

Table A8: Number and Percent of ZIP Codes where PHAs Reported Payment Standards (N=117) in Fort Worth-Arlington, TX

Number of PHAs Reporting Payment Standards	Number of ZIP Codes	Percent of ZIP Codes
0	1	0.9
1	7	6.0
2	29	24.8
3	75	64.1
4	2	1.7
5	1	0.9
6	1	0.9
7	1	0.9

Table A9: Number and Percent of ZIP Codes where PHAs Reported Payment Standards (N=56) in Gary, IN

Number of PHAs Reporting Payment Standards	Number of ZIP Codes	Percent of ZIP Codes
0	9	16.1
1	47	83.9

Table A10: Number and Percent of ZIP Codes where PHAs Reported Payment Standards (N=122) in Hartford-West Hartford-East Hartford, CT

Number of PHAs Reporting Payment Standards	Number of ZIP Codes	Percent of ZIP Codes
0	88	66.7
1	31	23.5
2	3	2.3

Table A11: Number and Percent of ZIP Codes where PHAs Reported Payment Standards (N=64) in Jackson, MS

Number of PHAs Reporting Payment Standards	Number of ZIP Codes	Percent of ZIP Codes
1	64	100.0

Table A12: Number and Percent of ZIP Codes where PHAs Reported Payment Standards (N=80) in Jacksonville, FL

Number of PHAs Reporting Payment Standards	Number of ZIP Codes	Percent of ZIP Codes
0	34	42.5
1	46	57.5

Table A13: Number and Percent of ZIP Codes where PHAs Reported Payment Standards (N=88) in Monmouth-Ocean, NJ

Number of PHAs Reporting Payment Standards	Number of ZIP Codes	Percent of ZIP Codes
0	53	60.2
1	35	39.8

Table A14: Number and Percent of ZIP Codes where PHAs Reported Payment Standards (N=64) in North Port-Sarasota-Bradenton, FL

Number of PHAs Reporting Payment Standards	Number of ZIP Codes	Percent of ZIP Codes
1	37	57.8
2	27	42.2

Table A15: Number and Percent of ZIP Codes where PHAs Reported Payment Standards (N=42) in Palm Bay-Melbourne-Titusville, FL

Number of PHAs Reporting Payment Standards	Number of ZIP Codes	Percent of ZIP Codes
0	14	33.3
1	28	66.7

Table A16: Number and Percent of ZIP Codes where PHAs Reported Payment Standards (N=432) in Philadelphia-Camden-Wilmington, PA-NJ-DE-MD

Number of PHAs Reporting Payment Standards	Number of ZIP Codes	Percent of ZIP Codes
0	211	48.4
1	208	48.1
2	14	3.2
3	1	0.3

Table A17: Number and Percent of ZIP Codes where PHAs Reported Payment Standards (N=369) in Pittsburgh, PA

Number of PHAs Reporting Payment Standards	Number of ZIP Codes	Percent of ZIP Codes
0	283	76.7
1	86	23.3

Table A18: Number and Percent of ZIP Codes where PHAs Reported Payment Standards (N=128) in Sacramento-Roseville-Arden-Arcade, CA

Number of PHAs Reporting Payment Standards	Number of ZIP Codes	Percent of ZIP Codes
0	74	57.8
1	54	42.2

Table A19: Number and Percent of ZIP Codes where PHAs Reported Payment Standards (N=135) in San Antonio-New Braunfels, TX

Number of PHAs Reporting Payment Standards	Number of ZIP Codes	Percent of ZIP Codes
0	62	45.9
1	73	54.1

Table A20: Number and Percent of ZIP Codes where PHAs Reported Payment Standards (N=169) in San Diego-Carlsbad, CA

Number of PHAs Reporting Payment Standards	Number of ZIP Codes	Percent of ZIP Codes
0	125	74.0
1	44	26.0

Table A21: Number and Percent of Zip Codes where PHAs Reported Payment Standards (N=200) in Tampa-St. Petersburg-Clearwater, FL

Number of PHAs Reporting Payment Standards	Number of ZIP Codes	Percent of ZIP Codes
0	68	34.0
1	132	66.0

Table A22: Number and Percent of ZIP Codes where PHAs Reported Payment Standards (N=57) in Urban Honolulu, HI

Number of PHAs Reporting Payment Standards	Number of ZIP Codes	Percent of ZIP Codes
1	28	49.1
2	29	50.9

Table A23: Number and Percent of ZIP Codes where PHAs Reported Payment Standards (N=443) in Washington-Arlington-Alexandria, DC-VA-MD

Number of PHAs Reporting Payment Standards	Number of ZIP Codes	Percent of ZIP Codes
0	232	52.4
1	177	40.0
2	27	6.1
3	3	0.7
4	2	0.5
5	1	0.2
6	1	0.2

Table A24: Number and Percent of ZIP Codes where PHAs Reported Payment Standards (N=74) in West Palm Beach-Boca Raton, FL

Number of PHAs Reporting Payment Standards	Number of ZIP Codes	Percent of ZIP Codes
3	73	98.6
5	1	1.4

Appendix B

Payment Standards as a Percent of SAFMRs

Table B1: Payment Standards as a Percent of SAFMRs for the Atlanta-Sandy Springs-Roswell, GA Metropolitan Area (N=351)

	0 Bedroom	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
All Payment Standards Reported in the Metropolitan Area	97.00	97.66	97.15	96.79	96.66
Payment Standards in Low-Opportunity ZIP Codes[1]	100.82	102.07	100.94	99.87	100.15
Payment Standards in High-Opportunity ZIP Codes[2]	95.74	96.24	95.90	95.77	95.51

[1]Low-opportunity ZIP codes = ZIP codes with SAFMR<100% Area FMR
[2]High-opportunity ZIP codes = ZIP codes with SAFMR>=100% Area FMR

Table B2: Payment Standards as a Percent of SAFMRs for the Bergen-Passaic, NJ Metropolitan Area (N=136)

	0 Bedroom	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
All Payment Standards Reported in the Metropolitan Area	92.03	92.09	92.09	91.98	92.10
Payment Standards in Low-Opportunity ZIP Codes[1]	94.59	94.73	94.73	95.00	94.76
Payment Standards in High-Opportunity ZIP Codes[2]	90.00	90.00	90.00	89.59	90.00

[1]Low-opportunity ZIP codes = ZIP codes with SAFMR<100% Area FMR
[2]High-opportunity ZIP codes = ZIP codes with SAFMR>=100% Area FMR

Table B3: Payment Standards as a Percent of SAFMRs for the Charlotte-Concord-Gastonia, NC-SC Metropolitan Area (N=119)

	0 Bedroom	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
ll Payment Standards Reported in the Metropolitan Area	101.37	101.10	100.65	100.78	101.35
Payment Standards in Low-Opportunity ZIP Codes[1]	101.37	101.1	100.65	100.78	101.35
Payment Standards in High-Opportunity ZIP Codes[2]	n/a	n/a	n/a	n/a	n/a

[1]Low-opportunity ZIP codes = ZIP codes with SAFMR<100% Area FMR
[2]High-opportunity ZIP codes = ZIP codes with SAFMR>=100% Area FMR

Table B4: Payment Standards as a Percent of SAFMRs for the Chicago-Joliet-Naperville, IL Metropolitan Area (N=345)

	0 Bedroom	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
All Payment Standards Reported in the Metropolitan Area	104.25	106.04	103.95	101.08	98.83
Payment Standards in Low-Opportunity ZIP Codes[1]	104.01	105.97	104.04	101.3	98.11
Payment Standards in High-Opportunity ZIP Codes[2]	104.46	106.1	103.86	100.89	99.44

[1]Low-opportunity ZIP codes = ZIP codes with SAFMR<100% Area FMR
[2]High-opportunity ZIP codes = ZIP codes with SAFMR>=100% Area FMR

Table B5: Payment Standards as a Percent of SAFMRs for the Colorado Springs, CO Metropolitan Area (N=60)

	0 Bedroom	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
All Payment Standards Reported in the Metropolitan Area	104.20	101.68	102.92	99.10	94.28
Payment Standards in Low-Opportunity ZIP Codes[1]	109.50	110.00	110.00	106.92	104.45
Payment Standards in High-Opportunity ZIP Codes[2]	99.07	94.16	101.47	92.03	92.20

[1]Low-opportunity ZIP codes = ZIP codes with SAFMR<100% Area FMR
[2]High-opportunity ZIP codes = ZIP codes with SAFMR>=100% Area FMR

Table B6: Payment Standards as a Percent of SAFMRs for the Dallas, TX Metropolitan Area (N=1,071)

	0 Bedroom	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
All Payment Standards Reported in the Metropolitan Area	103.78	103.13	103.28	103.37	103.25
Payment Standards in Low-Opportunity ZIP Codes[1]	103.41	102.99	102.86	102.91	102.84
Payment Standards in High-Opportunity ZIP Codes[2]	104.11	103.23	103.67	103.8	103.64

[1]Low-opportunity ZIP codes = ZIP codes with SAFMR<100% Area FMR
[2]High-opportunity ZIP codes = ZIP codes with SAFMR>=100% Area FMR

Table B7: Payment Standards as a Percent of SAFMRs for the Fort Lauderdale, FL Metropolitan Area (N=321)

	0 Bedroom	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
All Payment Standards Reported in the Metropolitan Area	97.27	97.79	95.93	95.59	95.84
Payment Standards in Low-Opportunity ZIP Codes[1]	100.93	101.92	99.85	99.25	96.55
Payment Standards in High-Opportunity ZIP Codes[2]	96.45	96.78	94.97	94.7	95.08

[1]Low-opportunity ZIP codes = ZIP codes with SAFMR<100% Area FMR
[2]High-opportunity ZIP codes = ZIP codes with SAFMR>=100% Area FMR

Table B8: Payment Standards as a Percent of SAFMRs for the Fort Worth-Arlington, TX Metropolitan Area (N=302)

	0 Bedroom	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
All Payment Standards Reported in the Metropolitan Area	98.93	100.50	100.17	99.78	99.86
Payment Standards in Low-Opportunity ZIP Codes[1]	106.71	107.08	105.25	105.03	105.07
Payment Standards in High-Opportunity ZIP Codes[2]	94.44	95.76	92.91	93.49	92.62

[1]Low-opportunity ZIP codes = ZIP codes with SAFMR<100% Area FMR
[2]High-opportunity ZIP codes = ZIP codes with SAFMR>=100% Area FMR

Table B9: Payment Standards as a Percent of SAFMRs for the Gary, IN Metropolitan Area (N=56)

	0 Bedroom	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
All Payment Standards Reported in the Metropolitan Area	101.21	100.96	101.03	100.92	100.81
Payment Standards in Low-Opportunity ZIP Codes[1]	102.37	101.61	102.02	101.72	101.82
Payment Standards in High-Opportunity ZIP Codes[2]	100.00	100.00	100.00	100.00	100.00

[1]Low-opportunity ZIP codes = ZIP codes with SAFMR<100% Area FMR
[2]High-opportunity ZIP codes = ZIP codes with SAFMR>=100% Area FMR

Table B10: Payment Standards as a Percent of SAFMRs for the Hartford-West Hartford-East Hartford, CT Metropolitan Area (N=125)

	0 Bedroom	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
All Payment Standards Reported in the Metropolitan Area	101.60	102.42	101.99	101.87	101.31
Payment Standards in Low-Opportunity ZIP Codes[1]	105.75	105.60	106.12	106.15	107.03
Payment Standards in High-Opportunity ZIP Codes[2]	99.08	100.90	99.75	99.55	98.22

[1]Low-opportunity ZIP codes = ZIP codes with SAFMR<100% Area FMR
[2]High-opportunity ZIP codes = ZIP codes with SAFMR>=100% Area FMR

Table B11: Payment Standards as a Percent of SAFMRs for the Jackson, MS Metropolitan Area (N=64)

	0 Bedroom	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
All Payment Standards Reported in the Metropolitan Area	100.00	100.00	100.00	100.00	100.00
Payment Standards in Low-Opportunity ZIP Codes[1]	100.00	100.00	100.00	100.00	100.00
Payment Standards in High-Opportunity ZIP Codes[2]	100.00	100.00	100.00	100.00	100.00

[1]Low-opportunity ZIP codes = ZIP codes with SAFMR<100% Area FMR
[2]High-opportunity ZIP codes = ZIP codes with SAFMR>=100% Area FMR

Table B12: Payment Standards as a Percent of SAFMRs for the Jacksonville, FL Metropolitan Area (N=80)

	0 Bedroom	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
All Payment Standards Reported in the Metropolitan Area	96.80	96.79	96.80	96.77	96.77
Payment Standards in Low-Opportunity ZIP Codes[1]	104.16	104.46	104.49	104.43	104.44
Payment Standards in High-Opportunity ZIP Codes[2]	91.13	91.39	91.39	91.38	91.38

[1]Low-opportunity ZIP codes = ZIP codes with SAFMR<100% Area FMR
[2]High-opportunity ZIP codes = ZIP codes with SAFMR>=100% Area FMR

Table B13: Payment Standards as a Percent of SAFMRs for the Monmouth-Ocean, NJ Metropolitan Area (N=88)

	0 Bedroom	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
All Payment Standards Reported in the Metropolitan Area	99.37	99.69	99.05	93.66	93.70
Payment Standards in Low-Opportunity ZIP Codes[1]	108.42	108.77	108.19	98.25	98.41
Payment Standards in High-Opportunity ZIP Codes[2]	95.22	95.53	94.85	91.56	91.55

[1]Low-opportunity ZIP codes = ZIP codes with SAFMR<100% Area FMR
[2]High-opportunity ZIP codes = ZIP codes with SAFMR>=100% Area FMR

Table B14: Payment Standards as a Percent of SAFMRs for the North Port-Sarasota-Bradenton, FL Metropolitan Area (N=91)

	0 Bedroom	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
All Payment Standards Reported in the Metropolitan Area	100.10	101.15	98.72	99.55	98.78
Payment Standards in Low-Opportunity ZIP Codes[1]	100.38	99.19	99.39	100.00	99.76
Payment Standards in High-Opportunity ZIP Codes[2]	99.81	103.15	98.05	99.09	97.78

[1]Low-opportunity ZIP codes = ZIP codes with SAFMR<100% Area FMR
[2]High-opportunity ZIP codes = ZIP codes with SAFMR>=100% Area FMR

Table B15: Payment Standards as a Percent of SAFMRs for the Palm Bay-Melbourne-Titusville, FL Metropolitan Area (N=42)

	0 Bedroom	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
All Payment Standards Reported in the Metropolitan Area	89.31	88.06	86.89	85.93	86.07
Payment Standards in Low-Opportunity ZIP Codes[1]	89.89	88.60	87.33	85.89	84.48
Payment Standards in High-Opportunity ZIP Codes[2]	88.99	87.66	86.64	85.94	86.95

[1]Low-opportunity ZIP codes = ZIP codes with SAFMR<100% Area FMR
[2]High-opportunity ZIP codes = ZIP codes with SAFMR>=100% Area FMR

Table B16: Payment Standards as a Percent of SAFMRs for the Philadelphia-Camden-Wilmington, PA-NJ-DE-MD Metropolitan Area (N=451)

	0 Bedroom	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
All Payment Standards Reported in the Metropolitan Area	103.13	103.76	103.81	103.77	103.83
Payment Standards in Low-Opportunity ZIP Codes[1]	103.33	104.55	104.59	104.48	104.62
Payment Standards in High-Opportunity ZIP Codes[2]	102.89	102.75	102.84	102.86	102.84

[1]Low-opportunity ZIP codes = ZIP codes with SAFMR<100% Area FMR
[2]High-opportunity ZIP codes = ZIP codes with SAFMR>=100% Area FMR

Table B17: Payment Standards as a Percent of SAFMRs for the Pittsburgh, PA Metropolitan Area (N=369)

	0 Bedroom	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
All Payment Standards Reported in the Metropolitan Area	100.04	100.38	100.13	99.93	99.84
Payment Standards in Low-Opportunity ZIP Codes[1]	105.69	106.79	105.92	106.04	105.38
Payment Standards in High-Opportunity ZIP Codes[2]	95.12	95.76	95.55	95.32	95.45

[1]Low-opportunity ZIP codes = ZIP codes with SAFMR<100% Area FMR
[2]High-opportunity ZIP codes = ZIP codes with SAFMR>=100% Area FMR

Table B18: Payment Standards as a Percent of SAFMRs for the Sacramento-Roseville-Arden-Arcade, CA Metropolitan Area (N=128)

	0 Bedroom	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
All Payment Standards Reported in the Metropolitan Area	102.72	102.55	102.54	102.61	102.60
Payment Standards in Low-Opportunity ZIP Codes[1]	110.00	110.00	110.00	110.00	110.00
Payment Standards in High-Opportunity ZIP Codes[2]	98.09	98.17	97.79	97.90	97.89

[1]Low-opportunity ZIP codes = ZIP codes with SAFMR<100% Area FMR
[2]High-opportunity ZIP codes = ZIP codes with SAFMR>=100% Area FMR

Table B19: Payment Standards as a Percent of SAFMRs for the San Antonio-New Braunfels, TX Metropolitan Area (N=135)

	0 Bedroom	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
All Payment Standards Reported in the Metropolitan Area	91.76	91.68	91.76	91.66	91.60
Payment Standards in Low-Opportunity ZIP Codes[1]	91.73	91.21	91.50	91.19	91.60
Payment Standards in High-Opportunity ZIP Codes[2]	91.79	92.11	92.01	92.09	91.60

[1]Low-opportunity ZIP codes = ZIP codes with SAFMR<100% Area FMR
[2]High-opportunity ZIP codes = ZIP codes with SAFMR>=100% Area FMR

Table B20: Payment Standards as a Percent of SAFMRs for the San Diego-Carlsbad, CA Metropolitan Area (N=169)

	0 Bedroom	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
All Payment Standards Reported in the Metropolitan Area	85.82	86.96	85.77	84.22	80.37
Payment Standards in Low-Opportunity ZIP Codes[1]	89.04	91.13	87.79	88.81	84.36
Payment Standards in High-Opportunity ZIP Codes[2]	84.32	85.01	84.83	81.59	78.50

[1]Low-opportunity ZIP codes = ZIP codes with SAFMR<100% Area FMR
[2]High-opportunity ZIP codes = ZIP codes with SAFMR>=100% Area FMR

Table B21: Payment Standards as a Percent of SAFMRs for the Tampa-St. Petersburg-Clearwater, FL Metropolitan Area (N=200)

	0 Bedroom	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
All Payment Standards Reported in the Metropolitan Area	96.32	98.42	98.70	100.41	99.09
Payment Standards in Low-Opportunity ZIP Codes[1]	99.68	103.74	104.42	105.23	104.79
Payment Standards in High-Opportunity ZIP Codes[2]	94.00	94.62	94.74	96.96	95.15

[1]Low-opportunity ZIP codes = ZIP codes with SAFMR<100% Area FMR
[2]High-opportunity ZIP codes = ZIP codes with SAFMR>=100% Area FMR

Table B22: Payment Standards as a Percent of SAFMRs for the Urban Honolulu, HI Metropolitan Area (N=86)

	0 Bedroom	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
All Payment Standards Reported in the Metropolitan Area	101.47	101.29	101.58	101.48	101.60
Payment Standards in Low-Opportunity ZIP Codes[1]	103.89	107.08	104.00	103.82	104.01
Payment Standards in High-Opportunity ZIP Codes[2]	96.97	99.05	97.08	97.12	97.10

[1]Low-opportunity ZIP codes = ZIP codes with SAFMR<100% Area FMR
[2]High-opportunity ZIP codes = ZIP codes with SAFMR>=100% Area FMR

Table B23: Payment Standards as a Percent of SAFMRs for the Washington-Arlington-Alexandria, DC-VA-MD Metropolitan Area (N=491)

	0 Bedroom	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
All Payment Standards Reported in the Metropolitan Area	103.98	104.70	105.87	105.67	105.85
Payment Standards in Low-Opportunity ZIP Codes[1]	104.54	105.51	107.14	106.63	106.68
Payment Standards in High-Opportunity ZIP Codes[2]	102.46	102.38	102.36	103.00	103.58

[1]Low-opportunity ZIP codes = ZIP codes with SAFMR<100% Area FMR
[2]High-opportunity ZIP codes = ZIP codes with SAFMR>=100% Area FMR

Table B24: Payment Standards as a Percent of SAFMRs for the West Palm Beach-Boca Raton, FL Metropolitan Area (N=221)

	0 Bedroom	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom
All Payment Standards Reported in the Metropolitan Area	100.00	98.72	98.50	98.55	98.97
Payment Standards in Low-Opportunity ZIP Codes[1]	100.00	99.00	98.60	98.76	99.45
Payment Standards in High-Opportunity ZIP Codes[2]	100.00	98.28	98.35	98.22	98.22

[1]Low-opportunity ZIP codes = ZIP codes with SAFMR<100% Area FMR
[2]High-opportunity ZIP codes = ZIP codes with SAFMR>=100% Area FMR

Appendix C

SAFMRs as a Percent of FMRs for the Buffalo-Cheektowaga-Niagara Falls, NY Metropolitan Area

Table C1: SAFMRs as a Percent of FMRs for the
Buffalo-Cheektowaga-Niagara Falls, NY Metropolitan Area (N=97)

ZIP Code	0 Bedroom	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom	Average 0-4 Bedroom
14001	94.07	94.09	93.49	94.31	94.41	94.08
14004	88.46	88.64	88.99	88.92	88.99	88.80
14006	89.86	90.00	90.11	90.72	90.54	90.25
14008	82.84	83.18	83.35	83.53	82.80	83.14
14012	82.84	90.00	92.37	92.51	87.45	89.03
14013	91.26	91.36	91.24	91.62	91.32	91.36
14025	102.50	102.27	102.50	102.40	102.15	102.36
14026	82.84	81.82	82.23	83.53	82.80	82.64
14028	98.28	98.18	98.00	98.80	98.28	98.31
14030	99.69	99.55	99.12	98.80	99.05	99.24
14031	99.69	99.55	100.25	99.70	99.83	99.80
14032	122.15	122.73	122.78	123.05	123.04	122.75
14033	91.26	91.36	91.24	91.62	91.32	91.36
14034	82.84	81.82	82.23	83.53	82.80	82.64
14035	91.26	91.36	91.24	91.62	91.32	91.36
14036	91.26	91.36	91.24	91.62	91.32	91.36
14037	91.26	91.36	91.24	91.62	91.32	91.36
14043	89.86	90.00	90.11	89.82	89.77	89.91
14047	88.46	88.64	87.86	88.02	88.22	88.24
14051	134.79	135.00	135.17	134.73	134.65	134.87
14052	85.65	85.91	86.73	86.23	85.90	86.08
14055	84.24	84.55	84.48	84.43	85.12	84.57
14057	82.84	81.82	82.23	83.53	82.80	82.64
14059	102.50	102.27	102.50	102.40	102.15	102.36
14061	89.86	90.00	90.11	89.82	89.77	89.91
14067	82.84	81.82	82.23	83.53	82.80	82.64
14068	120.75	120.00	120.53	120.36	120.72	120.47
14069	82.84	81.82	82.23	83.53	82.80	82.64
14070	82.84	81.82	82.23	83.53	82.80	82.64
14072	108.11	107.73	108.14	107.78	108.34	108.02
14075	94.07	94.09	94.62	94.31	94.41	94.30
14080	91.26	91.36	91.24	91.62	91.32	91.36
14081	88.46	88.64	88.99	88.92	88.99	88.80

Table C1: SAFMRs as a Percent of FMRs for the Buffalo-Cheektowaga-Niagara Falls, NY Metropolitan Area (N=97) *continued*

ZIP Code	0 Bedroom	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom	Average 0-4 Bedroom
14085	123.56	124.09	123.90	123.95	123.82	123.86
14086	84.24	84.55	84.48	84.43	85.12	84.57
14091	91.26	91.36	91.24	91.62	91.32	91.36
14092	101.09	100.91	100.25	100.60	100.60	100.69
14094	85.65	85.91	85.61	85.33	85.12	85.52
14095	82.84	83.18	83.35	83.53	82.80	83.14
14098	84.24	96.82	99.12	99.70	92.86	94.55
14102	88.46	88.64	88.99	88.92	88.99	88.80
14105	82.84	90.00	92.37	92.51	87.45	89.03
14108	82.84	81.82	82.23	83.53	82.80	82.64
14109	82.84	83.18	83.35	83.53	82.80	83.14
14111	85.65	85.91	86.73	86.23	86.67	86.24
14112	91.26	91.36	91.24	91.62	91.32	91.36
14120	88.46	88.64	87.86	88.02	88.22	88.24
14126	92.67	92.73	93.49	93.41	92.86	93.03
14127	106.71	106.36	105.88	105.99	106.79	106.35
14131	113.73	113.18	112.64	113.17	112.98	113.14
14132	82.84	81.82	82.23	83.53	82.80	82.64
14134	91.26	91.36	91.24	91.62	91.32	91.36
14139	85.65	85.91	85.61	85.33	85.12	85.52
14141	82.84	81.82	82.23	83.53	82.80	82.64
14145	82.84	81.82	82.23	83.53	82.80	82.64
14150	92.67	91.36	92.37	91.62	92.09	92.02
14151	91.26	91.36	91.24	91.62	91.32	91.36
14169	91.26	91.36	91.24	91.62	91.32	91.36
14170	94.07	94.09	93.49	93.41	93.64	93.74
14172	91.26	91.36	91.24	90.72	91.32	91.18
14174	82.84	81.82	82.23	83.53	82.80	82.64
14201*	82.84	81.82	82.23	83.53	82.80	82.64
14202*	98.28	98.18	98.00	97.90	98.28	98.13
14203*	112.32	113.18	112.64	113.17	112.98	112.86
14204*	82.84	81.82	82.23	83.53	82.80	82.64
14205*	91.26	91.36	91.24	91.62	91.32	91.36
14206*	82.84	81.82	82.23	83.53	82.80	82.64
14207*	82.84	81.82	82.23	83.53	82.80	82.64
14208*	92.67	92.73	92.37	92.51	92.86	92.63
14209*	89.86	90.00	88.99	88.92	88.99	89.35
14210*	85.65	85.91	85.61	85.33	85.12	85.52
14211*	88.46	88.64	88.99	88.92	88.99	88.80
14212*	82.84	81.82	82.23	83.53	82.80	82.64
14213*	87.05	87.27	86.73	87.13	86.67	86.97

Table C1: SAFMRs as a Percent of FMRs for the Buffalo-Cheektowaga-Niagara Falls, NY Metropolitan Area (N=97) *continued*

ZIP Code	0 Bedroom	1 Bedroom	2 Bedroom	3 Bedroom	4 Bedroom	Average 0-4 Bedroom
14214*	92.67	92.73	92.37	92.51	92.86	92.63
14215*	88.46	88.64	87.86	88.02	88.22	88.24
14216*	94.07	94.09	94.62	94.31	94.41	94.30
14217	91.26	91.36	91.24	91.62	92.09	91.51
14218*	82.84	81.82	82.23	83.53	82.80	82.64
14219	85.65	85.91	85.61	85.33	85.12	85.52
14220*	85.65	84.55	85.61	85.33	85.12	85.25
14221	129.17	129.55	128.41	128.44	129.23	128.96
14222*	106.71	106.36	107.01	106.89	106.79	106.75
14223*	91.26	90.00	90.11	90.72	90.54	90.53
14224	95.48	95.45	95.74	96.11	95.96	95.75
14225	88.46	88.64	87.86	88.02	88.22	88.24
14226	99.69	100.91	100.25	100.60	100.60	100.41
14227	109.52	109.09	109.26	109.58	109.11	109.31
14228	110.92	110.45	110.39	110.48	110.66	110.58
14231	91.26	91.36	91.24	91.62	91.32	91.36
14240*	91.26	91.36	91.24	91.62	91.32	91.36
14261	91.26	91.36	91.24	91.62	91.32	91.36
14301	82.84	81.82	82.23	83.53	82.80	82.64
14302	82.84	83.18	83.35	83.53	82.80	83.14
14303	87.05	87.27	86.73	87.13	86.67	86.97
14304	82.84	83.18	83.35	83.53	83.58	83.30
14305	88.46	88.64	88.99	88.92	88.99	88.80

Source: HUD 2018 FMRs and SAFMRs

Note: ZIP codes in the city of Buffalo are denoted with an asterisk "*"

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