

Managers and Supervisors Overseeing the Implementation of the Rent Reform Demonstration
Semi-Structured Interview Guide

[Shaded and bracketed text indicates notes for the interviewer]

Research team introductory script

My name is _____, and I am with MDRC (or Urban Institute, a research organization working with MDRC), the organization that has worked with HUD and your agency on the alternative rent rules and procedures. Thank you for your time. My goal during this meeting is to understand how the alternative rent rules (or policy) are being implemented. I am also interested in understanding how households understand and experience the new policy and their questions about it.

I (we) know that you are busy and will try to be as brief as possible. Public reporting burden for this collection of information is estimated to average 90 minutes per response. HUD may not conduct or sponsor, and a person is not required to respond to, a collection information unless that collection displays or reports a valid OMB control number. The OMB control number for this collection is 2528-0306, and it expires XX-XX-XXXX. This interview is not part of an audit or a compliance review. We are interested in learning about your experiences. There is no right or wrong answer.

The information will be used to understand the implementation of a new rent policy for voucher holders and housing authorities that issue them. If you have any comments regarding this burden estimate or any other aspect of this collection of information, including suggestions to reduce this burden, please send them to the Marina L. Myhre, Office of Policy Development and Research, US. Department of Housing and Urban Development, Washington, DC 20410-3600. When providing comments, please refer to OMB Approval No. xxxx. HUD may not conduct and sponsor, and a person is not required to respond to, a collection of information unless the collection displays a valid control number.

Your participation in this interview is voluntary. There is no right or wrong answer – we just want to understand your experiences. We will protect your responses from disclosure. MDRC and Urban Institute researchers will not release your name and identity on any reports or in any discussions with supervisors or colleagues at the housing authority.

Do you agree to participate? Would it be okay for me to record so I don't have to take notes while we're talking? (NAME will take notes as backup to the recording.)

Do you have any questions before we begin?

Thank you for agreeing to participate in this interview.

HUD introduction

My name is _____, and I am with Office of Policy Development and Research at HUD, the agency working with the [PHA] on the alternative rent rules and procedures. If you agree, I would like your permission to observe how MDRC conducts this interview. I would like you to know that I am only here to monitor the research and I will not use any of your personal information or discuss any of the experiences you describe during this interview for any other purpose. Your responses will remain private.

[Interviewer: at start of audio, state date, time, & interview #]

I. INTRODUCTION

1. What is your title? (Has your title changed in the last few years?)
2. What is your role at [PHA]?
3. In what capacity have you been involved with the implementation of the alternative rent rules under the Rent Reform Demonstration? (Has this changed in the last few years?)

II. STAFFING AND CASELOAD

[Use the questions and related probes in this section to understand how RRD is staffed, changes made in light of rent policy PHA will continue to implement, and staff time use. Also, depending on the timing of interview, adjust tense, if needed.]

4. What is your role as a supervisor/ manager of the Rent Reform Demonstration?
 - a. Do you supervise the Rent Reform Demonstration housing specialists? (If not, then who does?)
5. Do Rent Reform Demonstration housing specialists only work with households under the alternative rent rules or do they split their time? Please explain.
6. How many housing specialists currently work with households under the alternative rent rules?
 - a. How many have worked with households under the alternative rent rules in the past?
 - b. Has there been a net loss or a net gain of housing specialists working on the alternative rent rules since the beginning of the rent reform demonstration (April 2015)?
 - Please explain the change in the number of housing specialists assigned to work with families. Does it have to do with the Rent Reform Demonstration needs?
 - If so, how have you reallocated Rent Reform Demonstration staff?
 - Do you plan to reallocate staff in the future? When, and how?
7. Has the [PHA] had to use “overtime” for Rent Reform Demonstration related activities since the last triennial recertifications?
 - a. If so, was this based on the needs of the Rent Reform Demonstration households or was it due to Rent Reform Demonstration staffing?
8. How do/did Rent Reform Demonstration housing specialists spend their time **between triennial recertifications**?
 - a. Do they spend most of their time on other Rent Reform activities?

- b. What other Rent Reform activities do they focus on?
 - c. Has COVID-19 affected their responsibilities on Rent Reform? What changed?
9. Do Rent Reform Demonstration housing specialists spend time working on other non-Rent Reform PHA-related activities?
- a. What other tasks do they spend time on?
 - b. Has COVID-19 affected their responsibilities on non-Rent Reform activities? What changed?
10. Are there other ways in which Covid-19 affected PHA operations? Anything in general you want to mention before we turn to the specific aspects of the alternative rent policy?

III. TRIENNIAL RECERTIFICATION

Use questions and probes in this section to understand experiences related to implementing triennial recerts. Encourage respondents to think about the experience over time i.e., the 2 triennials completed and what experiences persisted, what improved?

11. Did the process of conducting a triennial recertification get easier, remain challenging, or become more challenging over time?
- a. Explain why it became simpler (staff experience, more guidance?), remained challenging, or became more challenging.
12. What do you see as the most challenging aspect of the recertification process under the alternative rent rules?
- a. Explain. Could it be designed differently? What could improve it?
 - b. **[SAHA and LHA only]** Did the policy modification allowing more flexibility in verifying retrospective income (e.g. using cumulative earnings shown on a recent paystub, prior year taxes, or relying on self-certifications or income imputations) make triennial recertifications easier or less burdensome for staff?
 - What, if any, alternative verification methods did you utilize?
13. Is the alternative rent rules recertification process more or less complicated for *staff* than the conventional rules?
- a. Explain. Why? Is there something that could help simplify the recertification process?
14. How does the process for determining the utility allowance under the alternative rent rules compare to the process under the conventional rules?
- a. Is one more burdensome than the other?
 - b. What is the process for determining the utility allowance under the conventional rules?

15. Did Covid-19 affect implementation of the triennial recertification? How, and what practices or policies were affected?

IV. GRACE PERIOD

16. Did staff have any challenges implementing the Grace Period Rent? What types of issues did they raise?

V. INTERIMS FOR RENT REDUCTION & HOUSEHOLD COMPOSITION CHANGES

[Use the questions and probes in this section to understand the experiences implementing interim policies, whether any simplifications were introduced, what issues they addressed]

17. Has the volume of requests for interim recertifications to reduce rent under the alternative rent rules since the last triennial recertifications changed?
- Did it increase or decrease?
 - Were there notable differences since the start of the Covid-19 pandemic in March 2020?
 - Has household awareness or understanding of the rules regarding interim recertifications to reduce rent under the alternative rent rules affected the volume?
 - [LMHA and SAHA only] Did the policy modification eliminating the 10% threshold requirement to qualify affect how frequently families request interims? Did this policy modification help staff? How?
18. Did the [PHA] make any changes to its hardship policy to respond to the rent burden created by Covid-19?
- What changes were made?
 - When were these changes in effect? (Get at start/end dates).
 - What are some implications of these changes – for the PHA, staff, and households?
19. Were there any special HUD waivers that the PHA implemented in response to the Covid-19 crisis.
- Which of these are still in effect?
 - Which have ended?
 - How might these waivers affect the families in the Rent Reform demonstration.
 - What should we keep in mind when we look at the PHA data?
20. To your knowledge, have most families that have requested an interim reduction received one?
- Has the number of requests for an interim to reduce rent *that do not qualify* **increased, decreased, or stayed the same?**
 - Did you receive repeated requests from the same households?
21. Has the process of conducting interim recertifications to reduce rent under the alternative rent rules gotten easier with experience since the start of the Rent Reform Demonstration?
- Explain. What became simpler?

- b. Did any of the simplifications help?
22. What is the most challenging aspect of conducting interim recertifications to reduce rent under the alternative rent rules?
- a. Explain. Why? Is there something that could help?
 - b. [LMHA and SAHA only] Did the policy modification eliminating the 10% threshold requirement to qualify make the process easier or less burdensome for staff?
23. Is the alternative rent rules process for interim recertifications to reduce rent more or less complicated for *staff* than the conventional rules?
- a. Explain. Why? Is there something that could help?
24. Do you think the alternative rent rules regarding household composition affected household decisions to add or remove household members?
- a. Why or why not?
 - b. Do you think the rules affected their decision to report changes to (PHA name)?

VI. HARDSHIP POLICY, REQUESTS, REVIEW, AND REMEDIES

25. Have there been any *changes* to the way that hardship requests are being processed?
- a. If, yes, please describe what changed, when it changed, and why.
 - b. Did Covid-19 have any effect on the hardship policy or how it was implemented?
26. Has processing hardship requests gotten easier with experience since the start of the Rent Reform Demonstration?
- a. Explain. What became simpler, remained as challenging, or became more challenging over time?
27. On average, how long does it take for the PHA to process and approve or deny a hardship request from the time a hardship is requested to the time a decision is made?
- a. How, if at all, does the amount of time to process hardships differ for different types of households or circumstances? Please explain.
28. Who approves hardship requests and decides the remedy to grant a household?
- a. Do housing specialists have the authority to approve hardships or make hardship remedy decisions?
29. How do you (or the housing specialists) decide which hardship remedy to grant?
- [Possible remedies allowed under the alternative rent rules: Allowing an additional interim recertification; Setting the household's portion of rent at minimum rent for up to 180 days; Setting the household's portion of rent at 28 percent of current gross income (which could result in \$0 minimum rent (Lexington is

an exception), for up to 180 days; Offering a “transfer voucher” to support a move to a more affordable unit]

- a. Thinking about the different hardship remedy options, which one does the [PHA] most commonly grant? Which hardship remedy is used the least?
 - b. Have you used any of the other remedies? Why, or why not?
 - c. What is the typical length of the remedies granted?
- 30.** What are the household situations that commonly result in hardship request approvals? Did the types of situations change after the onset of Covid-19?
- a. E.g. permanent loss of income, temporary loss of income. Loss of job, seasonal employment, etc.
- 31.** To your knowledge, have most families that have requested a hardship received a hardship remedy?
- 32.** What are the most common reasons that hardship requests get denied?
- a. Are there circumstances that tend to trigger requests that get denied?
 - b. Are there households that make multiple requests but almost always get denied? Can you provide an example?
- 33.** Is there a certain type of household that tends to request and qualify for hardships more than the average? (single parent families, families working seasonal or erratic employment, etc.?)
- a. Can you describe an example?
- 34.** Do households typically request hardship extensions when the hardship remedy ends?
- a. Why? Do they have challenges readjusting back to the regular rent?
 - b. How often? (very often, sometimes, never?)
 - c. What happens in these cases?
 - d. Are extensions typically approved?
- 35.** What, if anything, do you think has affected the volume of hardship requests since the last triennial recertifications?
- a. Were there notable differences since the start of the Covid-19 pandemic in March 2020.
 - b. Has household awareness or understanding of the rules regarding the hardship policy affected the volume?
- 36.** To your knowledge, are most households aware of the hardship policy?
- a. Why or why not?
 - b. What steps has the [PHA] taken to help families understand the hardship policy?

37. Are there local grants or rental assistance programs available to families during Covid-19? What are they? To your knowledge, do/did Rent Reform families inquire about them at the [PHA]? Were they directed to these resources? Have you tracked Rent Reform families' use of these local grants or rental assistance programs?

VII. QUALITY CONTROL

38. What are the most common issues or errors you find during the quality control process for the alternative rent rules group?
- Can you provide some examples of the types of errors you see?
 - Have the types of errors changed over time? If so, how?
 - Have any process adjustments been made due to recurring errors?
 - Who conducts the quality control?
 - How do the errors that you are finding with the alternative rent rules group compare with the errors you find during the quality control process for the traditional rules?
 - Are they similar types of errors?
 - Are they more or less consequential in terms of the magnitude of the error (i.e., was the dollar value of the error higher or lower)?
 - Are there more or fewer errors for one policy or the other?

VIII. REACTIONS: LANDLORD AND COMMUNITY STAKEHOLDERS

39. Has the [PHA] received any positive or negative feedback about the alternative rent rules from landlords?
40. What, if any, types of issues or concerns have landlords raised about households under the alternative rent rules?
- Are they reporting that households are having difficulty meeting their rent obligations?
 - Are they reporting disputes with households over their rent obligations?
 - Are their concerns growing over time, or have they levelled off?
 - Can you tell if the professional property management companies are reacting differently from the independent landlords (that rent a few units)? How are their concerns different?
41. Overall, would you say the number of complaints from landlords renting to families in the alternative rules group is about the **same, more, or less** than the number you receive from landlords renting to families in the Traditional rules group?

42. How about feedback from other stakeholders? Has the [PHA] received questions or comments about the demonstration from other stakeholders in the community (e.g. case managers or counselors from other programs on behalf of a family; legal aid or advocates on behalf of the family)?
- What issues are coming up, and from whom? (questions, comments, or complaints?)
 - Are these typical issues or unique to the Rent Reform Demonstration?

IX. ENDING OR EXPANDING THE ALTERNATIVE RENT RULES

43. What factored into the PHA's decision to end/ expand the alternative rent rules? What are your thoughts about the decision to end/ expand the alternative rent rules?
44. [LHA only] What has been the reaction of non-rent reform households to the decision to expand the alternative rent rules? How was this policy change communicated to them?
- Have you heard from non-rent reform households that were notified of the change? What did they say? What questions did they have?
45. [LHA only] As you roll out the alternative rent rules for everyone (that is eligible) what operational or process changes have you made or do you plan to make? Why?
- Staffing assignments
 - Quality control process
 - Management and supervision
 - Training (for alternative rent rules)
 - Specific features of the rent policy
 - Other
46. [SAHA and LMHA only] What are the rent rules that households are transitioning to after rent reform implementation ends?
- Reporting requirements related to income
 - Reporting requirements related household composition
 - Recertification cycle
 - Rent calculation (percentage, assets, deductions)
 - Minimum rent
 - Utilities
 - Other
47. Have any changes been made to the rent rules for the *control* group since the last round of triennial recertifications?
- Reporting requirements related to income

- Reporting requirements related household composition
- Recertification cycle
- Rent calculation (percentage, assets, deductions)
- Minimum rent
- Utilities
- Other

X. REFLECTIONS

48. What do *you* like most about the alternative rent policy?
- b. [SAHA and LMHA] Are there any aspects of the alternative rent rules that you wish you could adopt for the regular rent rules?
49. What do *you* like least about the alternative rent policy?
- c. [LHA] Are there any aspects of the alternative rent rules that you wish LHA did not adopt for their implementation of this policy PHA-wide?
50. What would *you* say are the current feelings of the *housing specialists* about the new policy?
- a. Is this the **same, more positive, or more negative** than it was when they first started implementing the new policy?
- b. What aspects evoke the most negative or positive reactions?
- c. What has been the reaction of staff to the decision to end/expand the alternative rent rules?
51. What would *you* say are the current feelings of the *households* about the new policy?
- a. Is this the **same, more positive, or more negative** than it was about two years ago?
- b. What aspects evoke the most negative or positive reactions?
- c. What has been the reaction of households to the decision to end/ expand the alternative rent rules?
- Have you heard from households that were notified of the change? What did they say? What questions did they have?
52. Overall, are the alternative rent rules **simpler or more complicated** to administer than the traditional rent rules? Why? Explain.

[Probe about the alternative recertification process, about interims for rent reduction, calculating / determining utilities, about using retrospective income, about the grace period or hardship policy]

- a. In what way are the (alternative rent rules or traditional rent rules) more complicated?
- b. In what way are the (alternative rent rules or traditional rent rules) simpler?

53. Overall, are the alternative rent rules or the traditional rules more demanding on staff time? How?

[Probe about the alternative recertification process, about interims for rent reduction, and about using retrospective income, about the grace period or hardship policy]

- a. What aspects of the (alternative rent rules or traditional rent rules) are *more* demanding on staff time?
- b. What aspects are *less* demanding? Explain.

54. [If respondent says the alternative rent rules are in any way more complicated or more time-consuming or demanding on staff] Overall, are the complexities and demands of the alternative rent rules offset by any simplifications of the rules or by the triennial recertification cycle? Explain.

[Probes]

- a. Are the complexities and demands of the alternative rent rules (**recertification process** or **process for completing an interim recertification to reduce rent**) offset by the time savings due to the change to a three-year recertification period or the simplifications of some of the rules such as not having to collect and calculate deductions (such as Childcare deductions, medical deductions)?
- b. Overall, is there a net savings of time due to the change to a three-year recertification period or the simplifications of some of the rules such as not having to collect and calculate deductions (such as Childcare deductions, medical deductions)?
- c. What do staff do with that time savings? Have you shifted workload, staffing, hiring, or added or changed responsibilities or caseloads because of any net savings of time or efficiencies?

55. Are there any revisions you would recommend to the alternative rent rules or any completely new rent policy features you would HUD, your PHA, other PHAs considering rent reforms to consider?

56. Is there anything else you want to share about your experience with the Rent Reform Demonstration?