

**Housing Specialists Working with Alternative Rent Rules Group**  
**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 alternative policy and their questions about it. We conducted similar meetings with staff in Spring 2016.

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 [name] 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 AND STAFF BACKGROUND**

1. What is your title?
2. How long have you been working at (PHA name)?
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?)

**The housing agency started implementing the Rent Reform Demonstration in 2015, and as part of the demonstration, a group of households were selected to be subject to a new set of rent rules; throughout the interview we'll refer to these rent rules as the "alternate rent rules."**

4. You have or are working with families under the alternative rent rules, correct?
5. How long have you been working with these families?
6. On average, how many families do you work with in the alternative rent rules group?
  - a. [If applicable] In the control group?
  - b. [If applicable] How many families do you work with outside of rent reform?
  - c. Do you have an assigned caseload (as in, work with the same families)?

Alternative rules	
Control /Traditional rules group	
Outside rent reform	

7. In addition to recertifying families in the alternative rules group, describe your other main responsibilities.
  - a. What are the top three responsibilities that take up the most of your time? (Ask if these are all rent-reform related).
  - b. Have your main responsibilities in administering the alternative rent rules changed since the last recertification?
  - c. Do you work on non-Rent Reform PHA-related activities? What non-Rent Reform work do you do?
  - d. Has Covid-19 affected any of your responsibilities? What has changed?

**II. TRIENNIAL RECERTIFICATION / RENT CALCULATION**

**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?**

8. Looking back, did the process of conducting a triennial recertification get easier over time?

- a. Explain. What became simpler?
9. What remained the most challenging aspect of the triennial recertification process under the alternative rent rules?
    - a. Please explain why was it challenging?
    - b. What could be done to simplify or improve the process? Please describe.
  10. Would you say that the proportion of families having difficulty providing documents for calculating their retrospective income changed over the years? Has it increased, decreased, or stayed the same?
    - a. Are certain types of documents still more challenging to get from families? Can you provide a few examples?
    - b. Did families experiencing major difficulties get any special exemptions (or guidance how to meet the documentation requirements)?
    - c. [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?
  11. Do you find the recertification process under the alternative rent rules more or less complicated than the conventional rules? What makes it more complicated? Please give some examples of what makes it more complicated.
  12. How about households? Do they find the recertification process under the alternate rent rules more or less complicated than the conventional rules? Why?
  13. How does the process for determining the utility allowance under the alternative rent rules compare to the process under the conventional rules?
    - a. Is it easier / faster to process?
    - b. Is one more / less time consuming than the other?
    - c. What is the process for determining the utility allowance under the conventional rules? How is the process different for the alternative rent rules?
  14. On average, how many hours did/does it take you to complete a triennial recertification for families in the alternative rent rules group?
    - a. Did the process get quicker over time? Did the process get quicker for some types of families? For which types of families was the process quicker/easier? For which types was the process slower/longer?
    - b. [If the specialist also works with families under the regular rent rules] How does this compare to how long it takes to complete a recertification for families under the regular rent rules? Would you say **shorter, longer**, or the **same**?

### III. GRACE PERIOD RENT

15. Did you experience any challenges implementing the Grace Period Rent? What were the (top 3) challenges?
16. Did households find the grace period beneficial?
  - a. Did they have any concerns or challenges with the Grace Period Rent when it ended?

### IV. 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; also, how, if at all, Covid-19 affected interims]

17. Has the volume of requests for interim recertifications for loss of income under the alternative rent rules changed in the recent years (since the last triennial recertifications)?
  - a. Did it increase or decrease?
    - 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 interim recertifications affected the volume of interim recertification requests for loss of income?
  - c. [LMHA and SAHA only] Did the policy modification eliminating the 10% threshold requirement to qualify affect how frequently families request interims?
18. To your knowledge, have most families that have requested an interim reduction received one?
  - a. Has the number of requests for an interim to reduce rent *that do not qualify* **increased, decreased, or stayed the same**?
  - b. Did you receive repeated requests from the same households?
19. 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?
  - a. Explain. What became simpler?
  - b. Did any of the simplifications help?
  - c. Did Covid-19 make it more challenging to conduct interim recertifications? Please describe what types of challenges were/are being experienced?
20. 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?
21. Do you feel that the alternative rent rules process for interim recertifications to reduce rent is more or less complicated than the conventional rules?

a. Explain. Why?

22. How about for households? Is the process for interim recertifications to reduce rent more or less complicated under the alternative rules or conventional rules?

a. Explain. Why? Is there something that could help?

## V. HARDSHIP POLICY, REQUESTS, REVIEW, AND REMEDIES

23. 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. Were any of these changes implemented because of Covid-19?

i. Can you describe the process for hardship requests during Covid-19?

ii. Is this process temporary (ended) or still in use?

24. Has processing hardship requests gotten easier with experience since the start of the Rent Reform Demonstration?

a. Explain. What became simpler, remained challenging?

b. Did it become more challenging?

25. 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

b. Did it get shorter/longer at any point?

c. Did the process change due to Covid-19? How?

26. Who approves hardship requests and decides the remedy to grant a household?

a. Do you have the authority to approve hardships or make hardship remedy decisions?

27. How do you (or the supervisor) 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 mean \$0 minimum rent (except in Lexington), for up to 180 days; Offering a "transfer voucher" to support a move to a more affordable unit]

a. What hardship remedy does the housing authority most commonly grant?

b. Have you used any of the other remedies? Why, or why not?

c. What is the typical length of the remedies granted?

d. Did anything change because of Covid-19?

28. What are the household situations that commonly result in hardship request approvals?

- a. E.g. permanent loss of income, temporary loss of income. Loss of job, seasonal employment, etc.
29. To your knowledge, have most families that have requested a hardship received a hardship remedy? (we should understand if that was always the case or more recently because of the COVID-19 situation.)
30. What are the most common reasons that hardship requests get denied?
- a. Are there circumstances that tend to trigger requests that usually do not qualify?
  - b. Are there households that make multiple requests but almost always get denied? Can you provide an example?
31. 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?
32. 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?
33. 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?
34. To your knowledge, are most households aware of the hardship policy?
- a. Why or why not?
  - b. What is your impression based on?
35. 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?

## VI. FAMILIES' UNDERSTANDING AND REACTIONS TO ALTERNATIVE RENT POLICY

**Based on your interactions with families in the alternative rent rules policy, we would like to understand, from your perspective, their reactions to the alternative policy.**

36. Are there certain elements of the alternative rent policy that families tend to *misunderstand* or have challenges with?

- a. Which aspects?
    - Rent calculations, interims for rent reductions, utilities, hardships, etc.?
  - b. Do they understand what would make them qualify for an interim to reduce rent or a hardship?
  - c. Are there particular aspects of the hardship or interim policy that households find confusing or challenging?
37. Did families' understanding of the alternative rent policy *improve, get worse, or stay the same over time*?
- a. Which aspects?
    - Rent calculations, interims for rent reductions, utilities, hardships, etc.?
38. How do families *learn*, or clarify their understanding of, the alternative rent rules?
- a. Are they learning from experience? How, because their request(s) were rejected? By reaching out to the PHA?
  - b. What more can be done to help some families have a fuller understanding of the rent policy and its features / benefits?
39. What evidence have you seen, if any, that families are using the alternative rent policy information that the agency has provided (such as the flyers or printed materials included in the recertification packets)? Can you provide some examples?
40. What alternative rent policy questions do Rent Reform households ask you or other PHA staff about?
- a. What are the most common questions?
  - b. How frequent are these questions?
41. What general reactions, *positive and negative*, have you heard about the alternative rent policy from families?
42. Based on your interactions, what do families think/say about:
- a. Triennial recertifications? (How common was this reaction?)
  - b. Not having to report increase in income between recertifications? (How common was this reaction?)
    - Did some families report income increases anyway just to be safe? If so, what were they told?
  - c. The requirement to pay minimum rent directly to the landlord? (How common was this reaction?)
  - d. The revised utilities policy? (How common was this reaction?)
  - e. Grace Period Rent? (How common was this reaction?)
  - f. The interim rent reduction policy? Do they think it is fair? (How common was this reaction?)
    - [LMHA and SAHA only] Did the policy modification eliminating the 10% threshold requirement to qualify affect how families felt about interims?
  - g. The hardship policy? Do they think it is fair? (How common was this reaction?)

## VII. ALTERNATIVE RENT RULES AFFECT ON HOUSEHOLDS

43. Overall, what is your sense of how the alternative rent rules are benefiting families?
- Can you talk through a few households that benefitted some, a lot, or very little? (See if staff can pull up case files available for this part).
  - Do you think these households would have had a different experience under the traditional rent rules?
44. Are there any ways that the alternative rules are negatively affecting families?
- Can you provide some examples? Are these typical cases?
  - Do you think these households would have had a different experience under the traditional rent rules?
45. Thinking about families that saw significant earnings increases between triennial recertifications, how would describe them? (Were these families that had multiple earners, single-adult families, smaller/larger families? What differentiates them from others?)
- Do you think these households would have had the same increases in income under the traditional rent rules? Why or why not?
46. Did the alternative rent rules protect families more or less during COVID in comparison to families under the traditional rent rules?
47. Could you tell me about any cases that stand out (either because they were more complicated, or because the family was able to take advantage of the alternative rules, or because the families were especially harmed by the alternative rent rules)? How common are these cases?

## VIII. REACTIONS FROM LANDLORD

48. What, if any, types of issues or concerns have landlords or other stakeholders in the community raised about the alternative rent policy?
- 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?
  - Are these typical issues or unique to the Rent Reform Demonstration?

## IX. ENDING OR EXPANDING THE ALTERNATIVE RENT RULES

49. [LHA only] What has been the reaction of non-rent reform households to the decision to expand the alternative rent rules? (This includes former control group members and households that were not in the Rent Reform demonstration.)
- Have you heard from non-rent reform households that were notified of the change? What did they say? What questions did they have?



50. Have you heard of any Rent Reform households inquiring about going back to the traditional rules?
- Is this a common reaction?
  - What do you understand their reasons to be?
51. Have you heard of any non-Rent Reform households inquiring about changing to the alternative rent rules (is the word spreading)?

## IX. REFLECTIONS

52. Overall, have the alternative rent rules gotten easier to implement since the start of the Rent Reform Demonstration?
- Which aspects of the alternative rules have been most challenging for you?
  - What became simpler, remained challenging?
  - Did it become more challenging?
53. Overall, are the alternative rent rules **simpler or more complicated** to administer than the traditional rent rules? Why?
- [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]
- In what way are the (alternative rent rules or traditional rent rules) more complicated?
  - In what way are the (alternative rent rules or traditional rent rules) simpler?
54. What are your thoughts on the PHA's decision to end/ expand the alternative rent rules?
55. If you had to work exclusively with families under the alternative rent rules or the traditional rules – which would you choose? Why?
56. What do *you* like most about the alternative rent policy?
- [SAHA and LMHA] Are there any aspects of Rent Reform that you wish the PHA would adopt for the regular rent rules?
57. What do *you* like least about the alternative rent policy?
- [LHA] Are there any aspects of Rent Reform that you wish the PHA would not adopt for the regular rent rules?
58. Are there any revisions you would recommend to the alternative rent rules or any completely new rent policy features you would want to suggest to HUD or other PHAs considering rent reforms?
59. Is there anything else about your experience with the alternative rent rules policy that is important for us to understand or that you would like to share?