

UNITED STATES DISTRICT COURT
DISTRICT OF THE DISTRICT OF COLUMBIA

OPEN COMMUNITIES ALLIANCE, *et al.*,

Plaintiffs,

v.

BEN CARSON, *et al.*,

Defendants.

Civ. Action No. 1:17-cv-02192 (BAH)

Chief Judge Beryl A. Howell

DECLARATION OF ALISON BELL

1. My name is Alison Bell. I am the Executive Director of the Baltimore Regional Housing Partnership (BRHP), an agency created to administer Housing Choice Vouchers and housing mobility counseling pursuant to the Partial Consent Decree and Final Settlement in the case of *Thompson v. HUD*. *Thompson* was a class action challenging decades of racial discrimination by the federal and state governments regarding public housing in Baltimore. Prior to my position at BRHP, I worked as a consultant to public housing agencies (PHAs) and to HUD through the firm of Nan McKay and Associates. In that capacity and in my current position, I have had regular contact with HUD staff, and I am familiar with HUD regulations and procedure. I hold a B.A. from the University of Alabama, and a Master's Degree in Public Policy from Johns Hopkins University.

2. The BRHP administers approximately 3,700 geographically targeted Housing Choice Vouchers throughout the Baltimore region. Under the court ordered settlement agreements, we are empowered to administer vouchers across the entire region, which encompasses several county-based PHAs. We are also empowered to set our rental payment standards (rents) at a high enough level to enable our low income clients to access apartments and other rental

opportunities in low poverty, high opportunity areas throughout the region. Thus, we already carry out essentially the same tasks required to implement small area FMRs.

3. Pursuant to the settlement agreement, we currently have six distinct payment standards for the five-county region, set at the census tract level. Administratively, this is similar to setting payment standards by zip code. Our clients would not have access to these high opportunity areas using the regular Fair Market Rents for the Baltimore region.

Software developed for multiple payment standards in a region

4. In order to help our staff identify and explain to clients the differences in allowable rents in different neighborhoods, we developed a software application that permits staff or clients to type in an address and find the payment standard applicable to that address. This system was not difficult to develop, and has made it much easier to administer vouchers with different rent standards across multiple neighborhoods and communities. We did not need any guidance or assistance from HUD to set up this system.

5. The BRHP is also a member of “Mobility Works,” a foundation-funded technical assistance group, which includes the Inclusive Communities Project, Housing Choice Partners, the Center on Budget and Policy Priorities, and the Poverty & Race Research Action Council. Mobility Works provides assistance to PHAs and local fair housing groups seeking to develop housing mobility programs for voucher families in their regions.

6. In our work in several highly segregated metropolitan areas through Mobility Works, we have consistently found the absence of a small area FMR or regional exception payment standard system to be the primary barrier to families seeking to move to higher opportunity areas.

7. In order to assist PHAs in transitioning from a single FMR payment standard to multiple payment standards across a region, we have adapted our payment standard software to be used in any metropolitan area, and we have offered the software free of charge to PHAs we are working with. The cost of developing this software was approximately \$10,000, and we can make it available to any of the PHAs that are required to implement the SAFMRs in their regions. The software is currently in use in St. Louis, and is now being implemented in the Chicago region by Housing Choice Partners. We have also offered the software to at least one other PHA. The tool can be viewed here: www.hcvsearch.org.

Administrative burden and HUD technical assistance on Small Area FMRs

8. I do not consider the implementation of Small Area FMRs to be so complex as to require additional technical assistance from HUD. The process would involve applying the SAFMRs to different parts of the region (ideally in several groupings of zip codes with similar rent levels), adapting the HCV software system, revising client briefing materials, and training staff.

9. A number of the PHAs designated as “Moving to Work” PHAs (giving them greater flexibility to innovate and diverge from HUD regulations) have adopted multiple payment standards within their jurisdictions.

10. However, if HUD deems it necessary or desirable to offer technical assistance to PHAs implementing the Small Area FMR system, HUD likely has existing authority and funding to provide this assistance. For example, I am aware of a new HUD contract for a housing mobility “toolkit” that will provide training and technical assistance for PHAs – this could easily encompass guidance for PHAs to implement small area FMRs.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United

States of America that the foregoing is true and correct.



Executed: 11/7/2017