



Issue Date	April 30, 2010
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Audit Report Number	2010-CH-1006
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TO: Jorgelle Lawson, Director of Community Planning and Development, 5ED

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FROM: Heath Wolfe, Regional Inspector General for Audit, 5AGA

SUBJECT: The Other Place, Inc., Dayton, OH, Needs To Improve the Administration of Its Homelessness Prevention and Rapid Re-Housing Program Under the American Recovery and Reinvestment Act of 2009

## **HIGHLIGHTS**

### **What We Audited and Why**

We audited The Other Place, Inc.'s (The Other Place) use of the American Recovery and Reinvestment Act of 2009's (Act) Homelessness Prevention and Rapid Re-Housing Program (program) funds. The Other Place was selected for audit based upon a citizen's complaint to the Recovery Accountability and Transparency Board that was forwarded to our office. The complainant alleged that the City of Dayton, OH (City), The Other Place, and possibly Montgomery County, OH (County) engaged and set-up an unlicensed transitional housing shelter in violation of State of Ohio (State) and/or the City's laws, and was leasing units far in excess of the true value for comparable units. Our objectives were to determine whether The Other Place used program funds effectively and efficiently and complied with the U.S. Department of Housing and Urban Development's (HUD) requirements.

### **What We Found**

The Other Place generally used its program funds in accordance with HUD's and its requirements. It did not engage or set up an unlicensed transitional housing shelter in violation of State and/or City laws and did not lease units far in excess

of the true value for comparable units. However, The Other Place's administration of its program needs improvement. It provided rental assistance for units with program rents that were in excess of fair market rents for the area and for a larger unit than a program participant resided in. As a result, nearly \$1,000 in program funds was not used effectively and efficiently or in accordance with HUD's requirements.

Further, The Other Place did not ensure that the initial program participant consultation and eligibility determination was completed in a timely manner. Program participants began receiving rental assistance beginning on October 1, 2009, but the program application forms were not completed by the participants until December 2009. However, the participants were eligible to receive program rental assistance.

We informed The Other Place's executive director, the City's director of planning and community development, the County's community development manager, and the Director of HUD's Columbus Office of Community Planning and Development of a minor deficiency through a memorandum, dated April 21, 2010.

### **What We Recommend**

We recommend that the Director of HUD's Columbus Office of Community Planning and Development require The Other Place to reimburse its program from non-Federal funds for the improper use of nearly \$1,000 in program funds and implement adequate procedures and controls to ensure that its program is operated in accordance with HUD's and its requirements.

For each recommendation without a management decision, please respond and provide status reports in accordance with HUD Handbook 2000.06, REV-3. Please furnish us copies of any correspondence or directives issued because of the audit.

### **Auditee's Response**

We provided our review results to the Director of HUD's Columbus Office of Community Planning and Development and The Other Place's executive director during the audit. We provided our discussion draft audit report to The Other Place's executive director, City of Dayton and Montgomery County, OH, officials, and HUD staff during the audit. The executive director declined our offer for an exit conference.

We asked the executive director to provide comments on our discussion draft audit report by April 16, 2010. The executive director provided written comments, dated

April 13, 2010. The executive director generally disagreed with our finding. The complete text of the written comments, along with our evaluation of that response, can be found in appendix B of this audit report.

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## BACKGROUND AND OBJECTIVES

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***The Program.*** Authorized under Title XII of the American Recovery and Reinvestment Act of 2009 (Act), \$1.5 billion became available until September 30, 2011, for the Homelessness Prevention and Rapid Re-housing Program (program) administered by the U.S. Department of Housing and Urban Development (HUD). Allocations to State and local recipients shall be used for the provision of (1) short-term or medium-term rental assistance; (2) housing relocation; and (3) stabilization services including housing search mediation or outreach to property owners, credit repair, security or utility deposits, utility payments, rental assistance for a final month at a location, moving cost assistance, and case management or other appropriate activities for homelessness prevention and the rapid rehousing of persons who have become homeless.

***The Other Place.*** The Other Place, Inc. (The Other Place) is a not-for-profit corporation organized under the laws of the State of Ohio (State) that provides day shelter and support services to homeless people. It provides an environment in which basic services are offered, human needs addressed, and personal growth encouraged. It is governed by a board of trustees and shall not consist of more than 27 persons. As of March 2010, there were 10 members. Trustees shall serve for a term of 3 years or until their successors are elected. Officers include a president, secretary, treasurer, and such other officers as the board of trustees may from time to time determine are necessary.

The Other Place's mission is to work to end homelessness by providing housing, services, advocacy, and education. In addition, The Other Place provides case management services and offers an intensive service coordination approach in which trained professionals provide specialized services for homeless individuals, those at imminent risk of homelessness, and previous homeless individuals and families.

The Other Place's program is receiving \$360,000 in Act funds from the City of Dayton (\$281,500) and Montgomery County (\$78,500). As of January 31, 2010, The Other Place used \$17,640 of program funds. The Other Place's records are located at 1133 South Edwin C. Moses Boulevard, Suite 306, Dayton, OH.

***The City of Dayton and Montgomery County, OH.*** HUD allocated program funds for communities to provide financial assistance and services to either prevent individuals and families from becoming homeless or help those who are experiencing homelessness to be quickly rehoused and stabilized. HUD used its Emergency Shelter Grant formula to allocate program funds to metropolitan cities, urban counties, and States.

On August 14, 2009, HUD entered into a grant agreement with the City of Dayton (City) for nearly \$3 million in program funds. The agreement was pursuant to the provisions under the Homelessness Prevention Fund, Division A, Title XII, of the Act. The City entered into a grant agreement with The Other Place on September 23, 2009, for \$281,500 for managing and operating its program.

On August, 14, 2009, HUD awarded a grant to Montgomery County, OH (County), for nearly \$760,000 in program funds. The County is responsible for ensuring that each entity that administers all or a portion of program funds or receives all or a portion of program funds to carry out activities fully complies with the program's requirements. The County entered into a supplemental agreement with The Other Place pursuant to Resolution No. 09-1450, dated September 15, 2009, for \$78,500 in program funds.

Our objectives were to determine whether The Other Place used program funds effectively and efficiently and complied with HUD's and its requirements to include determining whether it (1) determined and paid the appropriate rental assistance and (2) ensured that the initial program participant consultation and eligibility determination was completed in a timely manner.

## RESULTS OF AUDIT

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### Finding: The Other Place Needs to Improve Its Program Administration

The Other Place administered its program contrary to HUD's requirements. It provided rental assistance for units with program rents that were in excess of fair market rents for the area and for a larger unit than a program participant resided in. The overpayments occurred because the County did not provide timely rent reasonableness schedules to The Other Place. Further, The Other Place did not ensure that the initial program participants' consultation and eligibility determinations were completed in a timely manner. The delay occurred because the Other Place lacked an understanding of the applicable program requirements. As a result, nearly \$1,000 in program funds was not used effectively and efficiently or in accordance with HUD's requirements.

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#### **The Other Place Provided Excessive Rental Assistance**

The Other Place provided supportive services to unsheltered homeless persons through City and County programs using funds provided by the Act. The Dayton-Montgomery County program rent reasonableness policy requires that a HUD rent reasonableness form be completed by either the landlord, using other units it owns, or Eastway, a Dayton-Montgomery County program housing search provider, using comparable units advertised for rent with its database, which is updated weekly. The County was the entity responsible for providing schedules with the applicable fair market rents to The Other Place.

The Other Place began housing program participants on October 1, 2009, when the participants entered into lease agreements with the landlord. It obtained a listing of Section 8 project-based market rents from the Dayton Metropolitan Housing Authority because it did not receive the schedules from the County. The Section 8 project-based market rents differed from the schedules eventually provided by the County on October 19, 2009. This discrepancy resulted in The Other Place's paying excess rental assistance of \$598 for 10 of the 11 program units. Further, The Other Place paid the rent for a one-bedroom unit when the unit was actually an efficiency unit, resulting in \$372 in excessive rental assistance. This error occurred because the Section 8 project-based market rents did not include the rent for an efficiency unit.

## **The Other Place Lacked an Adequate Understanding of HUD's Requirements**

The Other Place did not ensure that the initial program participants' consultation and eligibility determinations were completed in a timely manner. Program participants began receiving rental assistance on October 1, 2009, but the applications were not signed by the participants until December 2009. This delay was due in part to The Other Place's not receiving the application form from the County until after the form was revised on October 14, 2009. Further, program applicants were hesitant to sign the forms, and they were not completed until December 2009. Federal Register Notice, FR-5307-N-01, dated May 19, 2009, Notice of Allocations, Application Procedures, and Requirements for Homelessness Prevention and Rapid Re-Housing Program Under the American Recovery and Reinvestment Act of 2009, requires that any individual or family provided with financial assistance through the program have at least an initial consultation with a case manager or other authorized representative who can determine the appropriate type of assistance to meet the needs of the applicant. Although the initial program participant consultation and eligibility determination and the applications were not completed in a timely manner, all participants were eligible to participate in program.

## **Conclusion**

The Other Place paid \$970 (\$598 plus \$372) in excessive rental assistance because the County did not provide the rent reasonableness schedules in a timely manner. Further, it did not ensure that the initial program participants' consultation and eligibility determinations were completed in a timely manner. The delay occurred because the Other Place lacked an understanding of the applicable program requirements.

## **Recommendations**

We recommend that the Director of HUD's Office of Community Planning and Development require The Other Place to

- 1A. Reimburse its program \$970 (\$598 for the improper rent reasonableness determination plus \$372 for using the improper unit size for the rent determination) from non-Federal funds for the rental assistance cited in this finding.
- 1B. Implement adequate procedures and controls to ensure that its program is operated in accordance HUD's and its requirements.

## SCOPE AND METHODOLOGY

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To accomplish our objectives, we reviewed

- Applicable laws; Federal Register Notice, FR-5307-N-01, dated May 19, 2009; HUD's program requirements at 24 CFR (Code of Federal Regulations) Part 582; and HUD's program grant agreement with the City and the County.
- The City's and the County's 2008 consolidated plan substantial amendment for the program, their agreements with The Other Place, and the County's board resolutions for the program.
- The Other Place's general ledgers, policies and procedures, annual audited financial statements for 2008, memorandum of understandings, board meeting minutes, organizational chart, and grant agreements with the City and the County.

We also interviewed employees of The Other Place, the City, the County, and HUD.

We reviewed the following two allegations identified in the complaint forwarded to our office: the City, The Other Place, and possibly the County engaged and set up an unlicensed transitional housing shelter in violation of City and State laws and leased units far in excess of the true value for comparable units. We also reviewed 11 program participant applications to determine eligibility and whether program funds were used appropriately.

We performed our onsite audit work from January through February 2010 at The Other Place's office located at 1133 South Edwin C. Moses Boulevard, Suite 306, Dayton, OH. The audit covered the period from June 21 through December 31, 2009, and was expanded as determined necessary.

We conducted the audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our finding and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our finding and conclusions based on our audit objectives.

# INTERNAL CONTROLS

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Internal control is an integral component of an organization's management that provides reasonable assurance that the following controls are achieved:

- Program operations,
- Relevance and reliability of information,
- Compliance with applicable laws and regulations, and
- Safeguarding of assets and resources.

Internal controls relate to management's plans, methods, and procedures used to meet its mission, goals, and objectives. They include the processes and procedures for planning, organizing, directing, and controlling program operations as well as the systems for measuring, reporting, and monitoring program performance.

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## Relevant Internal Controls

We determined that the following internal controls were relevant to our audit objectives:

- Program operations - Policies and procedures that management has implemented to reasonably ensure that a program meets its objectives.
- Validity and reliability of data - Policies and procedures that management has implemented to reasonably ensure that valid and reliable data are obtained, maintained, and fairly disclosed in reports.
- Compliance with laws and regulations - Policies and procedures that management has implemented to reasonably ensure that resource use is consistent with laws and regulations.
- Safeguarding resources - Policies and procedures that management has implemented to reasonably ensure that resources are safeguarded against waste, loss, and misuse.

We assessed the relevant controls identified above.

A significant weakness exists if management controls do not provide reasonable assurance that the process for planning, organizing, directing, and controlling program operations will meet the organization's objectives.

### **Significant Weakness**

Based on our review, we noted no significant weaknesses.

### **Separate Communication of a Minor Deficiency**

We informed The Other Place's executive director, the City's director of planning and community development, the County's community development manager, and the Director of HUD's Columbus Office of Community Planning and Development of a minor deficiency through a memorandum, dated April 21, 2010.

## APPENDIXES

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### Appendix A

#### SCHEDULE OF QUESTIONED COSTS

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Recommendation number	Ineligible 1/
1A	<u>\$970</u>
Total	<u>\$970</u>

1/ Ineligible costs are costs charged to a HUD-financed or HUD-insured program or activity that the auditor believes are not allowed by law; contract; or Federal, State, or local policies or regulations.

## Appendix B

### AUDITEE COMMENTS AND OIG's EVALUATION

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#### Ref to OIG Evaluation

#### Auditee Comments



the other place  
until there's no homelessness.

April 13, 2010

Ronald Farrell Assistant Regional Inspector General for Audit  
United States Department of HUD-Office of Inspector General  
200 North High Street Room 334  
Columbus, Ohio 43125

Dear Mr. Farrell,

I am writing in response to the discussion draft audit report of HUD's Office of Inspector General for Audit dated April 2, 2010. As instructed our response includes our comments in regards to the issues contained in the draft report, subject: The Other Place, Dayton Ohio, Needs to Improve the Administration of Its Homelessness Prevention and Rapid Rehousing Program (HPRP) Under the American Recovery and Reinvestment Act of 2009.

The audit officially began onsite February 1, 2010 at our administration offices located at 1133 S Edwin C Moses Boulevard, Dayton, Ohio. I and key staff were prepared with the requested documentation and presented them to Senior Auditor Kathleen Crago. The Other Place provided all agency financials, policy and procedures manuals for the entire organization, Board minutes, all contracts and access to bank records along with additional info for the period of June 1, 2009 through December 30, 2009. The Other Place feels strongly as part of our response to this audit report, that it should be noted there were no significant weaknesses in any of these areas during the internal control portion evaluation of the audit. The Other Place operates its programs and services with the highest standards of conduct.

**Ref to OIG Evaluation**

**Auditee Comments**

**Comment 1**

It is our understanding now The Other Place was selected for audit based upon a citizen complaint to the Recovery Accountability and Transparency Board that alleged The Other Place and possibly The City of Dayton and Montgomery County engaged and set up an unlicensed transitional housing shelter utilizing Homelessness Prevention and Rapid Rehousing resources and also violating State and City Laws. We further understand the purpose of the audit was also to determine whether The Other Place used program funds effectively and efficiently and complied with the U.S. Department of Housing and Urban Development’s (HUD) requirements.

**Comment 2**

We can agree with the initial comment on Page 1 of the Audit Report that states, ”The Other Place generally used its program funds in accordance with HUD’s and its requirements,” but would prefer the audit response would use a stronger indicator of compliance than to use the word “generally.” “Generally” is vague and lacks the proper indication of our compliance with HUD’S guidelines. We fully agree with and will reiterate “The Other Place did not engage or set up an unlicensed transitional housing shelter in violation of State and/or City of Dayton, OH laws and did not lease units in far excess of the true value for comparable unit,” which is what initiated the audit originally.

In response to the finding that states, “The Other Place’s administration of its program needs improvement in that we provided rental assistance for units with program rents that were in excess of fair market rents for the area and for a larger unit that a program participant resided in.” The Other Place as a subgrantee, administered its portion of the HPRP program in accordance to the guidelines provided by the direct Grantee, the City of Dayton and Montgomery County. According to HUD’s website, “HUD is committed to implementing Recovery Act investments swiftly and effectively as they generate tens of thousands of jobs, modernize homes to make them energy efficient, and help the families and communities hardest hit by the economic crisis.” In an effort to implement projects “swiftly” many communities lacked sufficient knowledge to execute HPRP programs in total accordance of the guidelines.

**Comment 3**

The Other Place was not provided Rent Reasonableness guidelines from our Project Administrator, the City of Dayton and Montgomery County, at the onset of the project to determine participant eligibility. Initially, we were instructed to use Fair Market Rent (FMR) calculations to determine rent reasonableness. We used the FMR schedule (see attached) that was created by Dayton Metropolitan Housing Authority, our local PHA which indicated \$588 for a 1 bedroom unit as meeting Fair Market Rent guidelines. It was not until several weeks later that were we given a rent reasonableness chart by Dayton and Montgomery County. The chart, marked “draft” (see attached) differed from the fair market rent allowance we began operating the program under. That chart still did not incorporate rent with full utilities included or efficiencies.

**Ref to OIG Evaluation**

**Auditee Comments**

The units referred to in the audit report in which HPRP provided rental assistance (prevention) were being rented for \$588 per month, which included all utilities. It was not until after our audit concluded did we find out the Fair Market Rent Chart we obtained from DMHA contained an error, specifically as it pertains to 1 bedroom units. (See Attached.) Dayton and Montgomery County's Homeless HPRP program now provides a monthly updated rent reasonableness chart to all providers. Changes occur often as the rent reasonableness market study is based on many factors that change regularly. Program eligibility determinations based on rent reasonableness are done at enrollment and not reevaluated month to month based on new figures. The Other Place was utilizing the best and most current information, obtained from reputable agencies, in October 2009 when these participants were originally enrolled in the HPRP Program. We would have had no reason to reevaluate rent reasonableness during the period October 2009 through December 2009. So, We strongly disagree with the finding that The Other Place operated a Homeless Prevention and Rapid Rehousing Program that was not effective and efficient based in that we provided rental assistance for units with program rents that were in excess of fair market rents for the area.

**Comment 4**

In response to the finding of providing rental assistance to a larger unit than the participant resided in. The Other Place recognizes the opportunity for error with the design of HUD's Homelessness Prevention and Rapid Rehousing Program (HPRP) Under the American Recovery and Reinvestment Act of 2009, specifically in providing rental assistance (prevention) to participants. With no HUD requirements for inspection of potential prevention program participant's existing housing units, there is a reliance on participant self report, and/or landlord report on the size and condition of the unit. The leases for these particular units did not state bedroom size. No inspection to verify habitability, size, or location is required to determine program eligibility for prevention services. It was not until a site visit from the auditor, Kathy Crago did it become known that a specific unit was an efficiency unit as opposed to a one bedroom unit. This lack of verification through visual inspection is a flaw in HUD's design of the Prevention portion of the HPRP program and could be happening throughout the country. The Other Place followed HUD's and Dayton and Montgomery County's guidelines in determining eligibility by relying on landlord information for the units in question. This is not an indication of The Other Place's ability to operate the HPRP program effectively and efficiently, so we disagree with the finding.

In regards to The Other Place ensuring program participant consultation and eligibility determination being completed in a timely manner, The Other Place HPRP program participants received consultation and program determination at the time of the enrollment in October 2009. The Other Place staff had

**Ref to OIG Evaluation**

**Auditee Comments**

the information needed regarding housing status, income and resources to make an eligibility determination although Dayton and Montgomery County was still in the process of developing all of the required application forms and documentation requirements prior to October 1, 2009. The Other Place completed all required forms as they became available. Signatures on final versions of their completed application were obtained at various times. We did not ask clients to back date any documentation to coincide with the actual dates of enrollment and determination. Dates in sections of the HPRP application forms can possibly continue to differ from the dates of enrollment as additional information can be obtained at different times. While the actual paper application was completed at a later date this does not indicate that participant's consultation and eligibility determination was not completed prior to enrollment. Case notes in client files would indicate that services and eligibility was done in a timely manner. Once the City of Dayton and Montgomery County finalized and distributed all required forms, documentation, and policies and procedures for the HPRP program. The Other Place had all participants moving forward immediately sign required paperwork upon completion. The Other Place disagrees with a finding of not ensuring program eligibility determination in a timely manner.

Dayton and Montgomery County's HPRP program and its subgrantees have continued to adjust and fine tune its administration of the HPRP resources since its beginning in October of 2009. Many changes came as a result of Dayton and Montgomery County seeking Technical Assistance from the HUD field office and/or clearer instruction from HUD Homeless Resource Exchange (HUDHRE) website. The Dayton and Montgomery County HPRP program, along with its subgrantees, including The Other Place, continues to provide valuable resources for the intended "at risk of literal homelessness, but for the assistance," population with a better understanding of all program requirements. Adjustments to prevent possible recurrence of any of the initial oversights have been made to assure full compliance with all HPRP program guidelines. The Other Place should not be held responsible for any initial oversights that were a result of unclear guidance, timing issues or vague requirements that were either from the HPRP Grantee Dayton and Montgomery County or HUD itself.

**Comment 5**

As a good faith effort, The Other Place will seek the \$970 reimbursement from the landlord of the property. This does not indicate our agreement with your conclusion "The Other Place lacked an understanding of the applicable program requirements, and therefore needs to reimburse HUD" but more as an indication of our commitment to providing the highest level of services in an ethical, moral and fiscally responsible environment.

The Other Place is pleased to complete this audit process with our response to the draft findings and we fully support the finding that we did not operate a transitional housing program with HPRP funds, which is what initiated the original complaint. We stand

**Ref to OIG Evaluation**

**Auditee Comments**

behind our administration of the HPRP program and disagree that we lacked knowledge or understanding of the project, and actually believe in contrast of that statement, that in fact, The Other Place has more knowledge and understanding than most organizations operating HPRP programs. The Other Place historically, currently and into the future will continue to be a good steward of all our resources. If you have any additional questions or comments feel free to contact me at (937)293-1945 or e-mail [Tinap@theotherplace.org](mailto:Tinap@theotherplace.org).

Respectfully,

*Tina M. Patterson*

Tina M. Patterson  
Executive Director

Attachments:

DMHA FMR Schedule  
Rent Reasonableness Chart  
County Letter

Cc: Jim Martone, The Other Place Board of Directors President

## OIG's Evaluation of Auditee Comments

- Comment 1** We spoke with The Other Place's executive director before providing the audit notification letter on January 25, 2010, to discuss the audit's purpose and why it was initiated. Further, the audit objectives and that the audit was initiated based upon a citizen's complaint to the Recovery Accountability and Transparency Board that was forwarded to our office were included in our audit notification letter to the executive director.
- Comment 2** We believe that generally it is an accurate reflection of The Other Place's administration of its program considering the minor issues that we reported on.
- Comment 3** While we agree that the County did not provide the rent reasonableness schedules in a timely manner and although The Other Place made a good effort in obtaining the schedule of rents, it failed to determine whether the rental assistance paid was in compliance with HUD's standard of rent reasonableness or obtain comparable or market rents for the area from the City, County, or HUD's Web site. The Other Place lacked a clear understanding of HUD's requirements.
- Comment 4** The Dayton-Montgomery County agreement with The Other Place states that it is obligated to monitor and control all employees to ensure that program regulations and requirement are followed. The program's applicants must receive at least an initial consultation and eligibility assessment with a case manager who can determine eligibility and the appropriate type of assistance needed. According to the household member section of the intake and financial questionnaire, item #6 specifically addresses the number of bedrooms in the unit.
- Comment 5** The Dayton-Montgomery County agreement with The Other Place states that in the event that The Other Place violates any HUD regulations or requirements, including those related to the program, it shall assume full and complete responsibility for said violations, including repayment of improperly expended funds and payment of any penalty imposed.

## Appendix C

### HUD'S AND THE OTHER PLACE'S REQUIREMENTS

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Federal Register Notice, FR-5307-N-01, dated May 19, 2009, Notice of Allocations, Application Procedures, and Requirements for Homelessness Prevention and Rapid Re-Housing Program Grantees Under the American Recovery and Reinvestment Act of 2009, Part IVA(a)(4), states that the rental assistance paid cannot exceed the actual rental cost, which must be in compliance with HUD's standard of rent reasonableness. Rent reasonableness means that the total rent charged for a unit must be reasonable in relation to the rents being charged during the same period for comparable units in the private unassisted market and must not be in excess of rents being charged by the owner during the same period for comparable nonluxury unassisted units.

HUD's regulations at 24 CFR 582.305(b) state that HUD will only provide assistance for a unit for which the rent is reasonable. For tenant-based rental assistance, project-based rental assistance, and sponsor-based rental assistance, it is the responsibility of the recipient to determine whether the rent charged for the unit receiving rental assistance is reasonable in relation to rents being charged for comparable unassisted units, taking into account the location, size, type, quality, amenities, facilities, and management and maintenance of each unit, as well as not in excess of rents currently being charged by the same owner for comparable unassisted units.

The Dayton-Montgomery County program rent reasonableness policy requires that a HUD rent reasonableness form be completed by either the landlord, using other units it owns, or Eastway, a Dayton-Montgomery County program housing search provider, using comparable units advertised for rent with its database, which is updated weekly. Rent reasonableness means that the total rent charged for a unit must be reasonable in relation to the rents being charged during the same period for comparable units in the private unassisted market and must not be in excess of rents being charged by the owner during the same period for comparable nonluxury unassisted units. Comparable rents can be checked by using a market study, by reviewing comparable units advertised for rent, or with a note from the property owner verifying the comparability of charged rents to those of other units owned. For example, the landlord would document the rents paid in other units.

The Dayton-Montgomery County program states that the program applicant must receive at least an initial consultation and eligibility assessment with a case manager who can determine eligibility and the appropriate type of assistance needed.