

Analysis By: James M. Carter

## PORTLAND HOUSING BUREAU

All Funds Budget Summary	Adopted FY 2013-14	Request Base FY 2014-15	Decision Pkgs FY 2014-15	Request Total FY 2014-15	Percent Change
<b>Resources</b>					
Beginning Fund Balance	\$1,744,916	\$6,900,561	\$0	\$6,900,561	295.5%
Charges for Services	345,780	463,000	0	463,000	33.9%
Intergovernmental Revenues	57,965,229	58,716,845	0	58,716,845	1.3%
Interagency Revenue	73,332	77,162	0	77,162	5.2%
Fund Transfers - Revenue	0	0	3,000,000	3,000,000	-
Bond and Note Proceeds	8,029,941	7,424,000	0	7,424,000	-7.5%
Miscellaneous Sources	5,664,859	3,768,111	0	3,768,111	-33.5%
General Fund Discretionary	10,124,808	10,387,115	1,950,000	12,337,115	21.9%
<b>Total Resources</b>	<b>\$83,948,865</b>	<b>\$87,736,794</b>	<b>\$4,950,000</b>	<b>\$92,686,794</b>	<b>10.4%</b>
<b>Expenditures</b>					
Personnel Services	\$6,110,568	\$6,089,207	\$0	\$6,089,207	-0.3%
External Materials and Services	72,105,976	77,417,273	4,950,000	82,367,273	14.2%
Internal Materials and Services	1,085,612	1,086,004	0	1,086,004	0.0%
Debt Service	1,291,293	1,294,861	0	1,294,861	0.3%
Fund Transfers - Expense	1,087,481	587,622	0	587,622	-46.0%
Contingency	2,267,935	1,261,827	0	1,261,827	-44.4%
<b>Total Requirements</b>	<b>\$83,948,865</b>	<b>\$87,736,794</b>	<b>\$4,950,000</b>	<b>\$92,686,794</b>	<b>10.4%</b>
<b>Total Bureau FTE</b>	<b>54.90</b>	<b>56.90</b>	<b>0.00</b>	<b>56.90</b>	<b>3.6%</b>

Percent Change is the change from FY 2013-14 Adopted Budget to FY 2014-15 Total Requested Budget.

### Key Issues

#### Forecasted Decline and Instability in Mission Critical Resources

The most significant issue facing the Portland Housing Bureau (“Housing”) is the stabilization of its budget amidst the downward trajectory in non-General Fund resources. A variety of funding streams make up the Housing Bureau’s budget – broadly these funding sources are federal grants, General Fund discretionary, tax increment financing (TIF), and program income. The federal revenue streams include the Community Development Block Grants (CDBG), HOME, Housing for Persons With Aids (HOPWA), Emergency Solutions Grant, and others. Federal revenue has been on the decline in recent years, and TIF has become a less sustainable revenue source. The bureau’s forecast indicates that revenue from TIF will continue to decline and that federal funds are projected to level off. In the absence of offsetting increases in other sources of revenue, the Housing Bureau will be unable to continue its current level of services. It is forecasted that the total Housing budget will decrease by 29% in FY 2018-19 compared to FY 2012-13.

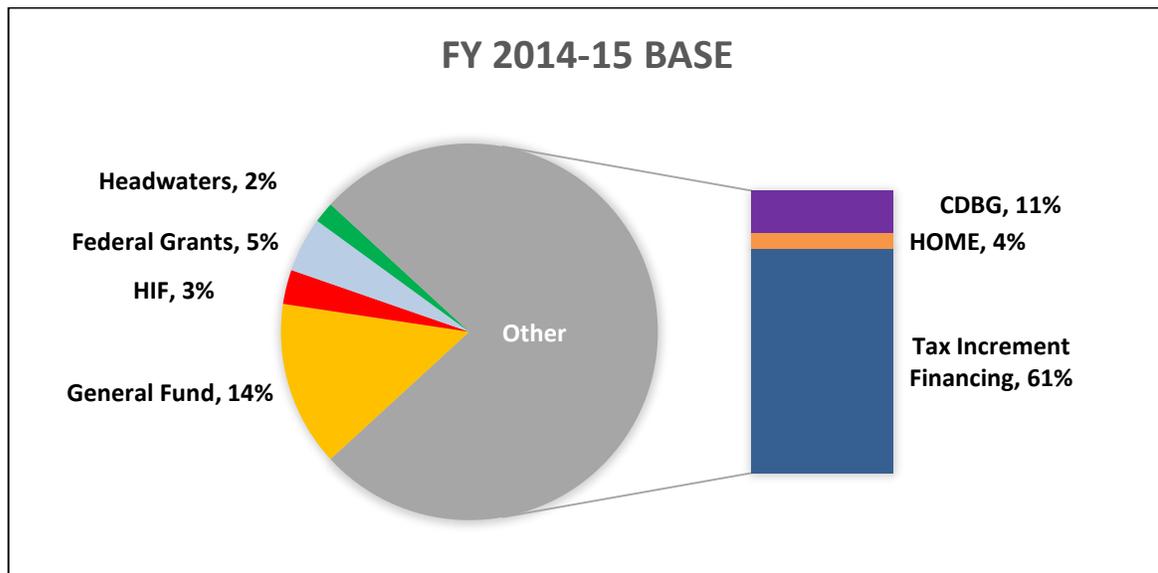
**Table 1. Resources Forecast – All Funds (excludes beginning fund balances)**

ALL FUNDS (dollars)	FY 2012-13 Actual	FY 2013-14 Revised	FY 2014-15 Base	FY 2015-16 Forecast	FY 2016-17 Forecast	FY 2017-18 Forecast	FY 2018-19 Forecast
General Fund Discretionary	10,327,772	12,031,115	10,387,115	10,549,154	10,799,019	11,003,586	11,246,923
Housing Investment Fund	2,597,426	2,513,540	2,154,243	2,100,920	2,095,583	2,066,366	2,063,708
CDBG allocation	7,701,777	8,163,351	7,701,777	7,701,777	7,701,777	7,701,777	7,701,777
HOME allocation	2,920,289	2,922,106	2,922,106	2,922,106	2,922,106	2,922,106	2,922,106
Federal Grants awarded	5,311,260	5,269,418	3,441,634	3,229,973	2,229,974	2,229,973	2,229,973
Tax Increment Financing	32,452,383	49,024,524	44,276,686	20,566,711	18,574,735	16,918,296	17,098,772
Headwaters	1,252,225	1,300,562	1,313,399	1,223,351	1,256,764	1,304,552	1,305,918
<b>TOTAL</b>	<b>62,562,132</b>	<b>81,224,616</b>	<b>72,196,960</b>	<b>48,293,992</b>	<b>45,579,958</b>	<b>44,146,656</b>	<b>44,569,177</b>

Section 108 Funds are excluded. Grant award allocations are reported for CDBG, HOME, & Federal grant funds (excluding ARRA).

In particular, the City’s affordable housing stock is unlikely to be preserved without supplemental investments. The major funding sources for affordable housing are TIF, CDBG, and HOME – combined, these funding sources make up about three-fourths of the bureau’s budget (see Graph 1).

**Graph 1. FY 2014-15 Base – All Funds (excludes beginning fund balances)**



Revenue from TIF is projected to decline from FY 2013-14, and this decline is likely to continue if there are no changes in the status quo. The issuance of remaining urban renewal debt must occur within the next decade. With the exception of the Education URA, tax increment revenues will be used for paying down outstanding debt and will have very limited availability to fund new projects, including affordable housing (For more details see CBO Review of PDC FY 2014-15 Requested Budget). Affordable housing development in the City’s urban renewal areas (URA) is supported by the 30% housing set-aside policy, which established the City Council’s policy for a “predictable and adequate funding and prioritization of housing for [those]

earning 80% Median Family Income (MFI) or less.”<sup>1</sup> About 79% of the housing set-aside has targeted income levels in the 0-60% MFI range. Declining revenues from TIF strains the City’s capacity to achieve affordable housing policy objectives into the future. This challenge is exacerbated by the rate and magnitude of rent increases in the housing market. For 2013, Portland was ranked third in annual rent growth at 6.6%.<sup>2</sup> Furthermore, it is estimated that for every 100 extremely low-income renter households, there are only 21 affordable and available rentals units.<sup>3</sup> In addition to affecting the scope of affordable housing development, declines in revenue from TIF and federal grants will constrain the bureau’s staffing model.

Furthermore, in the wake of federal sequestration, CDBG, HOME, and other federal funds have declined. The bureau forecasts funding at the current level of Congressional appropriations. From FY 2012-13 to FY 2018-19, there is a projected 19% decline in combined award allocations from CDBG, HOME, and Federal Grants.

The uncertainty of sustained funding for the Housing Bureau programs raises concerns of equity. Namely, there are disparities in housing outcomes experienced by communities of color, immigrant and refugee communities, and people with a disability. For example, by analyzing US Census data the Housing Bureau has established that a Native American in Multnomah County is three times more likely to live in poverty than a white person. This means that the affordable housing needs of this disproportionately low-income community will be unmet unless there are investments in housing development.

### **Significant Rate Changes/Cost of Service Study**

The Housing Bureau is assessing how it might adjust its fee schedule (for the programs referenced below) with the aim of increasing cost recovery. Adjustments in the fee structure will help to mitigate the decline in revenue sources, as mentioned in the previous section of this review. In addition to the decrease in direct revenue from TIF and federal grant funds, the bureau is collecting less program income tied to these funds. To offset the cost of service delivery, the bureau charges fees to the customers benefiting from these programs. The Housing Bureau reports that it will engage stakeholders to get feedback on revising fees tied to its 1) Indirect Programs, 2) Multi-family Housing Program, and 3) the HMIS Program.

#### *Decreasing the Rate of Subsidy of Costs in Indirect programs*

The Housing Bureau provides indirect financial assistance via tax and development fee exemptions and credits. These forms of assistance stimulate the production of affordable housing and increase homeownership opportunities. Limited Tax Exemptions (LTE) are offered through (a) Homebuyer Opportunity Limited Tax Exemption, (b) Multiple-Unit Limited Tax Exemption, and (c) Non-Profit Low Income Housing Limited Tax Exemption. Additionally, System Development Charge (SDC) Exemptions are accessible to developers through the Homeownership SDC Exemption Program and the Rental SDC

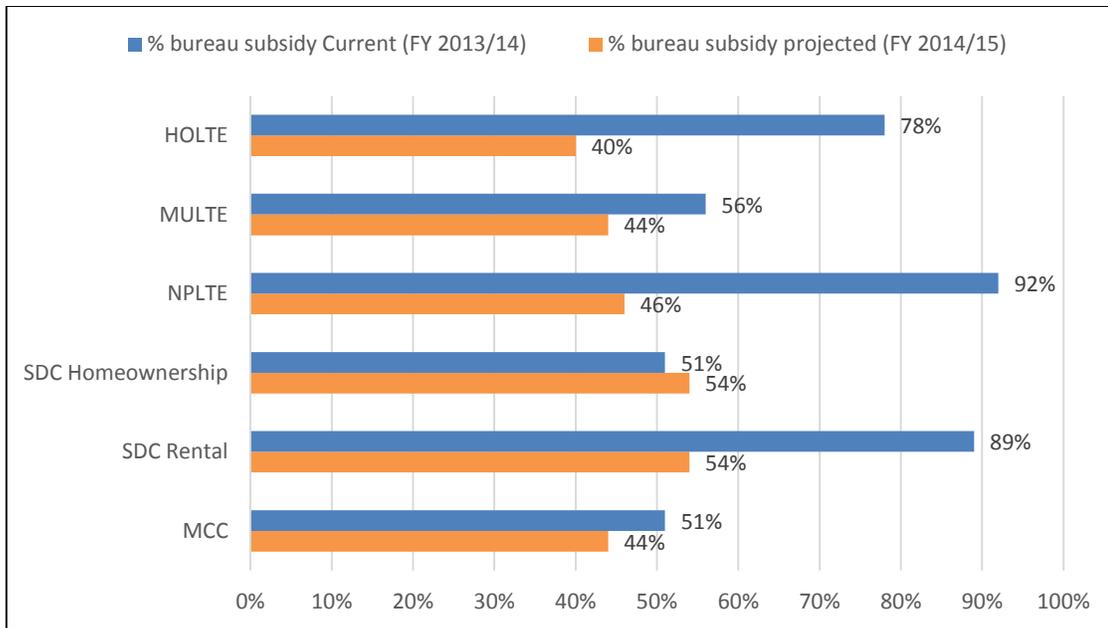
<sup>1</sup> City Council Resolution No. 36404 (April 26, 2006)

<sup>2</sup> MPF Research; [www.mpfresearch.com](http://www.mpfresearch.com)

<sup>3</sup> In Multnomah County, households of four earning less than \$21,900 are classified as ELI (extremely low-income); [www.urban.org/housingaffordability](http://www.urban.org/housingaffordability)

Exemption Program. Finally, the Mortgage Credit Certificate Program is an IRS-approved tax credit offered to low and moderate income households. The extent to which fees cover the direct and indirect costs incurred by the bureau determines the bureau’s subsidy rate. The bureau proposes to shift the cost burden in a way that recognizes the value of benefit to those paying fees. That is, historically the payer had minimal costs for fees and rates relative to the value of the benefit received in terms of tax abatements and Housing Bureau services. The graph below contains each program’s current and projected subsidy rates.

**Graph 2. Bureau Subsidy Rate for Indirect Programs: Current and Projected**



Through the bureau’s indirect programs, private partners receive a financial benefit and the City receives a public benefit in the form of affordable housing. The revised fee structure is intended to share the costs of these programs between the private partners and the Housing Bureau. The bureau will engage stakeholders to collect input on a revised fee schedule with plans to implement a new schedule beginning on July 1, 2014.

*Assessing Cost Recovery in Multi-Family Housing Programs*

A portion of the Housing Bureau budget is dedicated to offering financial assistance to private developers and individual residents in order to advance the development and preservation of affordable housing. This dedicated funding is distributed in the form of loans. The Housing Bureau loan portfolio includes “soft” and “hard” debt - soft debt is structured in a way that payments are only required if the project generates sufficient net operating income, and hard debt is amortized meaning recurring payments are required. The volume of “soft” debt in the bureau’s loan portfolio limits program income accrual back to the funds that sustain multi-family housing programs. In addition to the foregone program income that results from issuing soft debt, the Housing Bureau is challenged with covering costs (e.g. underwriting, compliance monitoring, and asset management) of managing the Multi-Family Housing Programs. Specifically, the bureau absorbs direct costs and indirect costs during the loan process and subsequent

monitoring. Currently, federal grants, TIF, and program income from the Housing Investment Fund pay for these expenses. The aforementioned decline in revenue from federal grants and TIF intensifies the need for the bureau to reconsider its cost recovery model for low performing (i.e. high cost) loans in its portfolio. Notably, the loan portfolio, as currently managed, meets policy objectives to develop affordable housing accessible to the lowest income residents. However, meeting these objectives is less sustainable as resources decline. The bureau plans to lead public discussions for the purpose of refining the cost recovery approach.

#### *Reviewing User Fees in Homeless Management Information System (HMIS) Program*

The bureau collects user fees from government and non-profit agencies who utilize the HMIS. Through a combination of these user fees and federal grants, the HMIS program is self-sustaining. There is an annual fee adjustment for per hour services; this fee adjustment is based on cost increases from the vendor and changes to the pool of users. The bureau has calculated that actual costs are slightly above the fee amount. As such, a study to be completed in May 2014 will inform how fees will be set in FY 2014-15.

## **Decision Package Analysis & Recommendations**

### **Permanent Housing and Access for Vulnerable Populations, HC\_01, \$1,000,000**

The package requests ongoing General Fund discretionary in the amount of \$1,000,000 to deliver housing services for the homeless and those at-risk of losing housing. This package proposes to expand the number of people served by engaging at least 250 homeless individuals. Interventions will target adults with disabilities, women, veterans, and vulnerable families. The aim is that at least 50 referrals will be made by public safety partners, namely by officers in the Portland Police Bureau, Park Rangers, and property maintenance workers from the Bureau of Environmental Services.

The interventions include housing placement, rent assistance, and street outreach to the most at-risk homeless people, including the mentally ill. The Housing Bureau contracts with community-based organizations that have demonstrated capacity to deliver these interventions. The contracts include funding for staff costs in addition to financial assistance to clients (e.g. short-term rent assistance).

Expected outcomes are measured in terms of retaining housing after receiving housing placement. In general, outcomes are measured at 6 months and 12 months. For rent assistance, the percentage of those served who retain housing after assistance ends varies by the risk level of the targeted population. At minimum, the expectation is that at least 70% of those served will retain housing 12 months after assistance ends. With regards to street outreach, the goal is that approximately 1 out of every 3 contacts will actively engage in receiving housing assistance. Out of those contacts who actively engage, at least 80% are expected to retain permanent housing after 12 months.

Notably, in the decision package the bureau states the intent to evaluate outcomes from the public safety partnership. Along these lines, CBO recommends similar ongoing assessments to better understand how efficiently and effectively resources are utilized. It may be assumed that contracted providers design their

programs based on models that are shown to be effective. As such, these providers should be able demonstrate to what extent they are implementing these models with fidelity (i.e. how they were intended). Evaluations would identify if providers are implementing models as designed and to what extent expected outcomes are achieved. Given the mission of the Housing Bureau and its partners to mitigate the challenges of Portlanders facing homelessness, it is paramount that the best outcomes are realized at the lowest possible costs.

Budget guidance for FY 2014-15 permitted bureaus to request add packages that would improve services in three key priority areas, one of which is reducing homelessness and hunger. To have a measured impact on this priority area, the bureau submitted this add package along with packages HC\_02 and HC\_03. However, due to the scarcity of General Fund discretionary resources the CBO does not recommend funding this add package.

*CBO Recommendation: \$0*

### **Homelessness and Emergency Preparedness, HC\_02, \$350,000**

The package requests \$350,000 in ongoing General Fund discretionary - \$275,000 increases capacity at homeless shelters and \$75,000 expands operations of the 211info social services referral program.

#### *Emergency Shelters*

The proposal restores budget reductions in General Fund discretionary to shelter programs. By restoring this budget, the Housing Bureau estimates that at least an additional 135 individuals will be served. This estimated number is based on decreased service levels from FY 2011-12 to FY 2012-13. In particular, the bureau highlights that part of this package may focus on increasing winter shelter capacity by as many as 70 beds.

Currently, there are an estimated 636 emergency shelter beds operating year-round, an additional 342 winter beds available from November 1 to March 31<sup>st</sup>, and up to 150 additional beds may be made available during severe weather. At any point in time, there is a waitlist for nightly shelter; the add package would help to reduce (although not eliminate) the waitlist. Based on recent performance, the Housing Bureau estimates that this add package may result in an increase from 40% to 45% in the percentage of exits from shelter into stable housing. The bureau reports that there may also be a slight decrease in average length of stay in shelter although the current projection is a 60 days.

#### *211info*

The \$75,000 General Fund discretionary requests expansion of staffing and client assistance (e.g. taxi fare and motel vouchers) for the 211info social service referral program. Staffing costs are budgeted for \$60,000 and client assistance for \$15,000. Currently, \$178,300 in General Fund and \$30,000 in CDBG funds contribute to the operation of the 211info program. Housing Bureau programs align with the needs of the clients who access 211info. Specifically, operations data report that rent and rental deposit

assistance is the top need for those who contact 211info and shelter is the 5th most frequent need.<sup>4</sup> Currently, the call center is staffed to take all types of client requests between standard business hours (Monday to Friday from 8am to 6pm). However, outside of standard business hours, the call center is only available to field calls for those in Multnomah County seeking access to family homeless services. Funding through this add package would be leveraged with County and other private and public funds to expand call center operations to include 24 hours, 7 days per week coverage for those seeking access to both the adult and family homeless services. Expanded access results in more timely referrals; nonetheless, the supply of referred services constrains client outcomes.

Altogether, the General Fund discretionary requests in this add package help to fill a resource gap created by past budget cuts approved by Council and the forecasted decline in federal revenue (e.g. Emergency Solutions Grant and Community Development Block Grant). Also, the bureau submitted this request to align with two key budget priorities: Homelessness & Hunger and Emergency Preparedness. However, due to the scarcity of General Fund discretionary resources at this time to restore prior year budget reductions or expand existing services; therefore, the CBO does not recommend funding this add package.

*CBO Recommendation: \$0*

### **Prevent and End Homelessness for Youth, HC\_03, \$500,000**

This add package seeks to restore \$500,000 in ongoing General Fund discretionary to support youth shelters and transitional services. In the FY 2013-14 budget, Council approved a one-time \$500,000 reduction in the City's contribution to short-term rent assistance (STRA). This \$500,000 was freed up and used for one-time funding of youth transitional services which was cut ongoing in the same budget (i.e. created a one-year bridge to an ongoing reduction). This cut reduced funding for youth transitional services from its historical level of around \$640,000. These funds have been passed through the County to support community-based organizations providing services to homeless youth.

The target population is homeless youth, ages 16 to 25 years old, needing housing and supportive services. At least 70 unduplicated homeless youth will be provided services through two organizations that will operate 14 beds each. In addition to housing, supportive services include: meals, case management, and as needed, rental assistance (e.g. application fees, move-in costs, and down payment). The length of stay in transitional housing is up to two years while efforts are made to secure permanent housing.

The expected result is 80% youth exiting transitional housing into permanent housing. Permanent housing is defined as a lease held by the client, permanent supportive housing, or staying with family or friends permanently. For the youth that move into permanent housing, 65% will retain housing 12 months after placement. The Housing Bureau reports that providers have been meeting expectations.

<sup>4</sup> 211info by the numbers <http://211info.org/reports>

Due to the scarcity of General Fund discretionary resources, the CBO does not recommend this add package at this time. It should be noted that this add package is a budget item included in the FY 2014-15 City-County proposal for cross-jurisdictional funding.

*CBO Recommendation: \$0*

**Equity: Fair Housing and Title VI Programs, HC\_04, \$100,000 (one-time)**

This add package requests \$100,000 one-time General Fund discretionary of which \$75,000 would launch a pilot project to promote fair housing and \$25,000 would enhance provider capacity to comply with Title VI of the federal Civil Rights Act.

*Fair Housing Pilot*

Housing Bureau partners assist low-income renters facing landlord-tenant issues that jeopardize equitable access to housing. Through this add package, the bureau will target a population whose issues can be addressed with interventions less expensive than legal aid. The Community Alliance of Tenants (CAT) helps to serve the needs of tenants not requiring legal support. CAT operates a tenant advice hotline with an annual call volume of 1,900. CAT estimates that 1 out of every 5 callers are prepared to take action; however, they lack the writing skills to engage their landlords. In particular, poor literacy, language barriers, and disability are obstacles which dissuade tenants from pursuing remedy.

The project expands system capacity by enhancing CAT's staffing levels. Through increased staffing, walk-in clinics will be scheduled on a regular basis, and tenants will receive follow-up to ensure their requests of their landlords are resolved. Furthermore, increasing clinic capacity to assist with letter writing frees up legal aid staff to focus on more formal legal interventions.

Expected outcomes are based on past results from a separate CAT program in which group letters are written on behalf of residents in specific buildings. CAT reports an 80+% success rate during its 11 years of running these programs. Success is defined as the request in the tenant's letter being addressed (e.g. obtaining reasonable accommodations for a disability). The Housing Bureau projects that the program will serve 360 clients and anticipates that 80% will have a positive outcome. This pool of 360 clients represents the 20% of advice hotline callers who are prepared to take action but need assistance. In addition to tracking to the 80+% success rate, the Housing Bureau also intends to capture data on housing retention one-year following.

*Title VI Compliance*

To improve Title VI compliance, this add-package includes \$25,000 to broaden the availability of interpretation services and to translate outreach materials into other languages. Title VI of the federal Civil Rights Act prevents discrimination by government agencies that receive federal funds. In 2013, City Council passed an ordinance to adopt the City's Civil Rights Title VI plan. The Housing Bureau plans to meet its requirements through realignment of existing resources. Nonetheless, Title VI compliance extends to the City's sub-recipient contractors. Federal regulations stipulate that if a government agency

is found in violation of Title VI, then that agency may lose its federal funding. This package request funds to support the efforts of the Housing Bureau's sub-recipient contractors.

Providers currently lack capacity to fully serve those who are not fluent in English. The Housing Bureau reports that through this package, interpretation services would be provided at larger public meetings and translation services of 350 pages of housing-related outreach materials. These efforts begin the process of mitigating the City's risk of civil litigation or federal sanction for violating Title VI.

Due to the scarcity of General Fund discretionary resources, the CBO is not recommending funding any components of this package. Notwithstanding, both the fair housing pilot project and efforts to ensure Title VI compliance advance the bureau's equity objective of eliminating disparities in housing opportunities.

*CBO Recommendation: \$0*

**Complete Neighborhoods: Housing Investment Fund, HC\_05, \$3,000,000 (one-time)**

This add package request \$3,000,000 in one-time General Fund discretionary to boost the City's capacity to build affordable housing. Both the rate and magnitude of cost increases in the rental market further deplete the supply of affordable housing. The demand for affordable housing overburdens the City's limited stock of affordable housing. Through this package, the Housing Bureau aims to generate capital investments that produce housing, which for a minimum of 60 years will offer affordable housing for low-income populations. The Housing Bureau estimates that each dollar invested would leverage four dollars in other public and private funds.

For 2013, Portland's rental unit occupancy rate was 94.4%<sup>5</sup> which translates into limited supply of rental units. Limited supply generally increases prices. For the rental market, there is an inverse relationship between supply of rental units and price. For 2013, Portland was ranked third in annual rent growth at 6.6%.<sup>6</sup> The difficulty in finding affordable rental housing is due to the fact that low-income renters far outnumber the supply of low-cost units. In the wake of the Great Recession, the number of cost-burdened households increased. A cost-burdened household is defined as one spending more than 30% of its income on housing. These cost-burdened households may forego fulfilling vital needs in order to pay for housing. For example, the amount of food purchased may decrease due to the cost-burden of increased rent.

The bureau highlights in its decision package that it would focus on keeping development costs low. This approach is key given the current performance of the HIF loan portfolio which is valued at approximately \$20 million. However, \$16 million of the book value is made up of cash flow and equity loans. For these two categories of loans, the borrower is allowed to make payments from net revenues after paying all

<sup>5</sup> US Census Bureau, Housing Vacancies and Homeownership. See <https://www.census.gov/housing/hvs/>

<sup>6</sup> MPF Research [www.mpfresearch.com](http://www.mpfresearch.com)

expenses and other debt service. Cash flow and equity loans help to meet the objective of supporting affordable housing production but compromise loan portfolio performance. That is, these types of loans discount the value of portfolio and limit program income accrual back to the HIF for future investments.

General Fund investments in the HIF will help to offset forecasted decline in both TIF and federal revenue (e.g. HOME and CDBG), which fund the bulk of affordable housing development by the bureau. In contrast to TIF investments being limited to urban renewal areas, HIF investments are not geographically limited. This broadens opportunities to access affordable housing, which helps to meet equity objectives. Additionally, the bureau submitted this request to align with the Complete Neighborhoods key budget priority. However, at this time there is a scarcity of General Fund discretionary resources; as such, the CBO does not recommend funding this add package.

*CBO Recommendation: \$0*

**City of Portland**  
 Decision Package Recommendations  
 (Includes Contingency and Ending Balance)

	Bureau Requested					CBO Analyst Recommendations					
	Bureau Priority	FTE	Gen Fund Ongoing	Gen Fund 1-Time	Other Revenues	Total Expenses	FTE	Gen Fund Ongoing	Gen Fund 1-Time	Other Revenues	Total Expenses
<b>Portland Housing Bureau</b>											
<i>Key Priorities</i>											
HC_01 - Permanent Hsg & Access for Vulnerable Popu	01	0.00	1,000,000	0	0	1,000,000	0.00	0	0	0	0
HC_02 - Homelessness & Emergency Prep: Shelter &	02	0.00	350,000	0	0	350,000	0.00	0	0	0	0
HC_03 - Prevent & end homelessness for youth	03	0.00	500,000	0	0	500,000	0.00	0	0	0	0
HC_05 - Complete Neighborhoods: Housing Investmei	05	0.00	0	3,000,000	0	3,000,000	0.00	0	0	0	0
<i>Total Key Priorities</i>		<i>0.00</i>	<i>1,850,000</i>	<i>3,000,000</i>	<i>0</i>	<i>4,850,000</i>	<i>0.00</i>	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>
<i>Critical Needs</i>											
HC_04 - Equity: Fair Housing and Title VI Programs	01	0.00	0	100,000	0	100,000	0.00	0	0	0	0
<i>Total Critical Needs</i>		<i>0.00</i>	<i>0</i>	<i>100,000</i>	<i>0</i>	<i>100,000</i>	<i>0.00</i>	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>
<b>Total Portland Housing Bureau</b>		<b>0.00</b>	<b>1,850,000</b>	<b>3,100,000</b>	<b>0</b>	<b>4,950,000</b>	<b>0.00</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>