

## HOUSING DEPARTMENT

### Impact Analysis Report

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#### ***OVERVIEW***

The Housing Department is responsible for the collection of fees related to the Rental Rights and Referrals Program (RRRP) and for the collection of Inclusionary Fees, Housing Impact Program, Rental Mediation Penalty Fees, Homebuyer Subordination Fees, and Multi-Family Fees.

The RRRP fees are collected from rental units covered by the Rent Control Ordinance and the Mobile Home Rent Control Ordinance. The fees are set at an amount to cover the estimated costs of providing the Program, which include mediation services to settle tenant-landlord disputes, information and referral services, and outreach and education services.

The City's Inclusionary Housing Policy, established in 1988, requires affordable housing units in newly-constructed for-sale housing developments with greater than 10 units that are located in former Redevelopment Project Areas. In limited circumstances, developers may choose to pay an "in-lieu" fee instead of building the required affordable units in the development. Although redevelopment agencies in California have been dissolved, the relevant provisions of the California Redevelopment Law requiring housing affordability in residential construction in Redevelopment Project Areas have not been repealed. Therefore, San José continues to implement its Inclusionary Housing Policy and require affordability in newly-constructed for-sale developments in those areas. For more information on the City's Inclusionary Housing Policy, please visit the Housing Department's website at:

<http://www.sanjoseca.gov/index.aspx?NID=1307>.

On January 12, 2010, the City Council adopted a city-wide inclusionary housing ordinance that required affordable housing obligations on all new for-sale developments of 20 or more units. The city-wide ordinance was scheduled to take effect on January 1, 2013; however, it was declared invalid on May 25, 2012 by the Santa Clara County Superior Court. The City successfully appealed this decision and oral arguments were heard on April 8, 2015 by the State Supreme Court. It is expected that the California Supreme Court will issue its opinion by summer 2015. The ordinance will not take effect or be implemented until there is a final court ruling.

On November 18, 2014 the City Council adopted an ordinance to establish a Housing Impact Fee Program on new market rate rental housing development to address the need for affordable housing associated with such new development. The City Council approved that the operative date of the ordinance be July 1, 2016, preceded by the implementation of an exemption process to minimize the financial impacts on development projects in the pipeline. The proposed grandfathering process exempts pipeline development projects from the new \$17 per square foot Housing Impact Fee if the rental development project has received an entitlement prior to July 1, 2016 and if the project receives its Certificate of Occupancy prior to January 31, 2020. New fees associated with the collection of pipeline project applications and to cover the cost for staff to track compliance and monitoring of exempted projects are recommended in accordance with the plan adopted by City Council.

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### ***SUMMARY AND IMPACT OF PROPOSED FEE REVISIONS***

#### Existing Fees

In order to bring the Rental Rights and Referrals Program closer to cost recovery, fee increases for rent-controlled apartments (from \$11.75 to \$12.25) and for mobile home units (from \$21.00 to \$27.00) are included. Non-rent controlled apartment fees will decrease to \$1.95. The cost to deliver this program is also going down, due primarily to lower consultant funding for mediation and arbitration services. Therefore, with this revision in costs, and incremental increases in the proposed fee levels, cost recovery for this Program will improve from 72.5% in 2014-2015 to 93.5% to 2015-2016. The Housing Department will continue its thorough review of the Program in order to identify opportunities for program improvement and to continue to improve cost recovery levels. Additionally, staff will evaluate a proposal to amend the Mobilehome Rent Ordinance in order to establish a Mobilehome Rent Petition Filing Fee to defray costs of the assigned Administrative Hearing Office for the rent petition hearing.

Recommended changes to existing fees pertaining to the management of the City's Multi-Family Affordable Housing Loan Portfolio will more accurately align the fees with the cost of delivering the services. In prior years, these services were primarily funded by loan payments and low and moderate income housing funds. As a result of the dissolution of the former Redevelopment Agency of the City of San José and the loss of the low and moderate income housing funds, the Housing Department is proposing fee

increases to maintain full cost recovery of these services to its loan portfolio.

For more complicated refinancing scenarios that exceed the base hours, property owners will be assessed an additional per hour rate for both Housing and City Attorney staff time. Proposed increases from \$110 per hour to \$130 per hour for Housing staff and from \$142 per hour to \$160 per hour for City Attorney staff are included. The proposed changes reflect the actual costs for the positions that perform these functions.

In order to better distinguish the level of work performed, the Multi-Family Project Owner Transfer Fee is recommended to be split into the following:

- *Multi-Family Project Owner Transfer Fee – Related Parties:* The base of \$14,115 fee recovers costs associated with the review, documentation, and closing of changes in the ownership structure of the project (either a transfer to a new partnership or a change in ownership of any GP or LP interest), when all parties involved are affiliates of parties in the existing ownership structure.
- *Multi-Family Project Owner Transfer Fee – New Parties:* The base \$18,420 fee recovers costs associated with the review, documentation, and closing of changes in the ownership structure of the Project (either a transfer to a new partnership or a change in ownership of any GP or LP interest), when new parties to the transaction are being admitted to the ownership structure.

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### ***SUMMARY AND IMPACT OF PROPOSED FEE REVISIONS***

#### Existing Fees (Cont'd.)

Increases to the Multi-Family Asset Management transaction fees are recommended as outlined below. These fees were established in 2013-2014 based on limited experience in completing these transactions. The proposed fees align with the prior two years of experience and reflect the appropriate staff time and resources necessary to complete these types of transactions. In addition, changes in salary, benefit, and indirect costs have been updated.

- *Multi-Family Loan Conversion Fee:* An increase to the Standard Transaction fee (from \$9,900 to \$38,030) is recommended, reflecting a change in the number of staffing hours for both the Housing Department (from 70 hours to 183 hours) and the City Attorney's Office (from 16 hours to 89 hours).
- *Multi-Family Loan Origination Fee:* An increase in the Standard Transaction fee (from \$35,000 to \$40,760) is recommended, reflecting staffing hours of 204 for the Housing Department and 89 for the City Attorney's Office.
- *Multi-Family Loan Recapitalization Fee:* An increase in the Standard Transaction fee (from \$5,950 to \$37,965) is recommended, reflecting a change in the number of staffing hours for both the Housing Department (from 27 hours to 183 hours) and for the City Attorney's Office (from 21 hours to 89 hours). The Standard Transaction fee recovers costs associated with the extensive review, negotiation, documentation, and closing of the new financing structure for a project where affordable housing project owners are going through a tax credit re-syndication and an existing City loan will remain outstanding.
- *Multi-Family Loan Refinance Fee:* An increase in the Standard Transaction fee (from \$3,745 to \$18,420) is recommended, reflecting a change in the number of staffing hours for both the Housing Department (from 16 hours to 106 hours) and for the City Attorney's Office (from 14 hours to 29 hours). The Standard Transaction fee recovers costs associated with review, documentation, and closing of a refinancing of, or amendment to, debt senior to the City's loan.
- *Multi-Family Project Restructuring Fee:* An increase in the Standard Transaction fee (from \$5,150 to \$37,965) is recommended, reflecting a change in the number of staffing hours for both the Housing Department (from 21 hours to 183 hours) and for the City Attorney's Office (from 20 hours to 89 hours). The base \$37,965 fee recovers costs associated with the review, negotiation, documentation, and closing of borrower requested amendments to the City's existing loan or affordability restriction terms.
- *City Housing Staff Time and City Attorney Staff Time:* These hourly rates have increased from \$110 per hour to \$130 per hour and from \$142 per hour and \$160 per hour, respectively, to more accurately reflect the appropriate staffing compliment and changes in salary, benefit, and indirect costs.

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### ***SUMMARY AND IMPACT OF PROPOSED FEE REVISIONS***

#### New Fees

##### *Multi-Family Loan Payoff Processing Fee:*

This \$3,600 fee will recover costs associated with the processing of a payoff of the City's existing loan. If additional time is necessary, an hourly rate of \$160 for Attorney staff time and \$130 for Housing staff time would apply.

##### *Housing Impact Fee Program:*

In order to implement the Housing Impact Fee Program, a number of new fees are recommended in accordance with the plan adopted by the City Council as referenced in the *Overview*:

- *Pipeline Application Processing Fee:* The Standard Transaction fee of \$3,200 reflects staffing hours of 20 for the Housing Department and 7 for the City Attorney's Office. If additional time is necessary, an hourly rate of \$160 for Attorney Staff time and \$99 for Housing staff time would apply. This fee is intended to recover the staff time associated with processing pipeline projects benefitting from the grandfathering exemption. For example, staff will be required to meet with developers to discuss potential obligations, interface with Planning on conditions of approvals, work with the City Attorney's Office to draft the agreements, and ensure the developer executes the agreement and that the document is recorded correctly.
- *Pipeline Annual Fee:* The Standard Transaction fee of \$1,740 reflects staffing hours of 13 for the Housing

Department and 2 for the City Attorney's Office. If additional time is necessary, an hourly rate of \$160 for Attorney staff time and \$100 for Housing staff time would apply. This fee recovers the staff time associated with monitoring all pipeline projects that benefit from the grandfathering provision of the Housing Impact Fee. This process is imperative because if a developer does not receive its Certificate of Occupancy prior to January 31, 2020, the developer will be required to pay the Housing Impact Fee.

As mentioned previously, the City's Inclusionary Housing Policy, requires affordable housing units in newly-constructed for-sale in former Redevelopment Project Areas. Developers may choose to pay an "in-lieu" fee instead of building the required affordable units in the development.

##### *Inclusionary Processing Fee:*

The Standard Transaction fee of \$3,200 reflects staffing hours of 20 for the Housing Department and 7 for the City Attorney's Office. If additional time is necessary, an hourly rate of \$160 for Attorney staff time and \$99 for Housing staff time would apply. This \$3,200 fee will cover the staff time associated with processing projects subject to the City's Inclusionary Housing Policy. For example, staff will be required to meet with developers to discuss potential obligations, interface with PBCE on conditions of approvals, work with the City Attorney's Office to draft the agreements, and ensuring the developer executes the agreement and that the document is recorded correctly.

## **HOUSING DEPARTMENT**

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### ***NOTIFICATION***

The Housing Department staff met with potential impacted stakeholders and held public hearings at the March 12, 2015 and April 9, 2015 Housing and Community Development Commission and at April 16 and April 17 Developer's Roundtable meetings. The Proposed Fees and Charges Report was released on May 1, 2015, allowing for a minimum of 10 days for public review. Public input on fee proposals will be heard by the City Council at public hearings held on Tuesday, May 12, 2015, at 1:30 p.m. and Monday, June 8, 2015, at 7:00 p.m. in the Council Chambers.

# DEPARTMENTAL FEES AND CHARGES

# HOUSING

Service	2014-2015 Adopted Fee	2014-2015 % Cost Recovery	2015-2016 Proposed Fee	2015-2016 Estimated Cost	2015-2016 Estimated Revenue		2015-2016 % Cost Recovery	
					Current Fee	Proposed Fee	Current Fee	Proposed Fee
<b>LOW/MOD INCOME HOUSING ASSET FD - CATEGORY I</b>								
<b>1. Homebuyer Subordination Fee</b>								
1 Homebuyer Subordination Fee	\$297 per transaction		\$202 per transaction					
<b>Sub-total Homebuyer Subordination Fee</b>		<b>100.0%</b>		<b>14,140</b>	<b>20,790</b>	<b>14,140</b>	<b>147.0%</b>	<b>100.0%</b>
<b>2. Multi-Family Affordability Restriction Monitoring Fee</b>								
1 Multi-Family Affordability Restriction Monitoring Fee	\$19.50/unit per year		\$20.25/unit per year					
<b>Sub-total Multi-Family Affordability Restriction Monitoring Fee</b>		<b>100.0%</b>		<b>4,050</b>	<b>3,900</b>	<b>4,050</b>	<b>96.3%</b>	<b>100.0%</b>
<b>3. Multi-Family Loan Conversion Fee</b>								
1 City Attorney Staff Time	\$142/hr in excess of 16 hours		\$160/hr in excess of 89 hours					
2 City Housing Staff Time	\$110/hr in excess of 70 hours		\$130/hr in excess of 183 hours					
3 Standard Transaction	\$9,900 per transaction		\$38,030 per transaction					
<b>Sub-total Multi-Family Loan Conversion Fee</b>		<b>100.0%</b>		<b>114,090</b>	<b>29,700</b>	<b>114,090</b>	<b>26.0%</b>	<b>100.0%</b>
<b>4. Multi-Family Loan Origination Fee</b>								
1 City Attorney Staff Time	\$142/hr in excess of 89 hours		\$160/hr in excess of 89 hours					
2 City Housing Staff Time	\$110/hr in excess of 205 hours		\$130/hr in excess of 204 hours					
3 Standard Transaction	\$35,000 per transaction		\$40,760 per transaction					
<b>Sub-total Multi-Family Loan Origination Fee</b>		<b>100.0%</b>		<b>81,520</b>	<b>70,000</b>	<b>81,520</b>	<b>85.9%</b>	<b>100.0%</b>
<b>5. Multi-Family Loan Payoff Processing Fee</b>								
1 City Attorney Staff Time			\$160/hr in excess of 3 hours					

# DEPARTMENTAL FEES AND CHARGES

# HOUSING

Service	2014-2015 Adopted Fee	2014-2015 % Cost Recovery	2015-2016 Proposed Fee	2015-2016 Estimated Cost	2015-2016 Estimated Revenue		2015-2016 % Cost Recovery	
					Current Fee	Proposed Fee	Current Fee	Proposed Fee
<b>LOW/MOD INCOME HOUSING ASSET FD - CATEGORY I</b>								
<b>5. Multi-Family Loan Payoff Processing Fee</b>								
2 City Housing Staff Time			\$130/hr in excess of 24 hours					
3 Multi-Family Loan Payoff Processing Fee			\$3,600 per transaction					
<b>Sub-total Multi-Family Loan Payoff Processing Fee</b>				<b>3,600</b>		<b>3,600</b>		<b>100.0%</b>
<b>6. Multi-Family Loan Recapitalization Fee</b>								
1 City Attorney Staff Time	\$142/hr in excess of 21 hours		\$160 in excess of 89 hours					
2 City Housing Staff Time	\$110/hr in excess of 27 hours		\$130/hr in excess of 183 hours					
3 Standard Transaction	\$5,950 per transaction		\$37,965 per transaction					
<b>Sub-total Multi-Family Loan Recapitalization Fee</b>		<b>100.0%</b>		<b>37,965</b>	<b>5,950</b>	<b>37,965</b>	<b>15.7%</b>	<b>100.0%</b>
<b>7. Multi-Family Loan Refinance Fee</b>								
1 City Attorney Staff Time	\$142/hr in excess of 14 hours		\$160/hr in excess of 29 hours					
2 City Housing Staff Time	\$110/hr in excess of 16 hours		\$130/hr in excess of 106 hours					
3 Standard Transaction	\$3,745 per transaction		\$18,420 per transaction					
<b>Sub-total Multi-Family Loan Refinance Fee</b>		<b>100.0%</b>		<b>221,040</b>	<b>44,940</b>	<b>221,040</b>	<b>20.3%</b>	<b>100.0%</b>
<b>8. Multi-Family Loan Servicing Fee</b>								
1 Multi-Family Loan Servicing Fee	\$19.50/unit per year		\$20.25/unit per year					
<b>Sub-total Multi-Family Loan Servicing Fee</b>		<b>100.0%</b>		<b>4,050</b>	<b>3,900</b>	<b>4,050</b>	<b>96.3%</b>	<b>100.0%</b>

# DEPARTMENTAL FEES AND CHARGES

# HOUSING

Service	2014-2015 Adopted Fee	2014-2015 % Cost Recovery	2015-2016 Proposed Fee	2015-2016 Estimated Cost	2015-2016 Estimated Revenue		2015-2016 % Cost Recovery	
					Current Fee	Proposed Fee	Current Fee	Proposed Fee
<b>LOW/MOD INCOME HOUSING ASSET FD - CATEGORY I</b>								
<b>9. Multi-Family Project Owner Transfer Fee</b>								
1 City Attorney Staff Time - New Parties			\$160/hr in excess of 29 hours					
2 City Attorney Staff Time - Related Parties	\$142/hr in excess of 24 hours		\$160/hr in excess of 22 hours					
3 City Housing Staff Time - New Parties			\$130/hr in excess of 106 hours					
4 City Housing Staff Time - Related Parties	\$110/hr in excess of 33 hours		\$130/hr in excess of 82 hours					
5 Standard Transaction	\$7,000 per transaction		Delete					
6 Standard Transaction - New Parties			\$18,420 per transaction					
7 Standard Transaction - Related Parties			\$14,115 per transaction					
<b>Sub-total Multi-Family Project Owner Transfer Fee</b>		<b>100.0%</b>		<b>97,605</b>		<b>97,605</b>		<b>100.0%</b>
<b>10. Multi-Family Project Restructuring Fee</b>								
1 City Attorney Staff Time	\$142/hr in excess of 20 hours		\$160/hr in excess of 89 hours					
2 City Housing Staff Time	\$110/hr in excess of 21 hours		\$130/hr in excess of 183 hours					
3 Standard Transaction	\$5,150 per transaction		\$37,965 per transaction					
<b>Sub-total Multi-Family Project Restructuring Fee</b>		<b>100.0%</b>		<b>37,965</b>	<b>5,150</b>	<b>37,965</b>	<b>13.6%</b>	<b>100.0%</b>
<b>11. Single-Family Loan Payoff Fee</b>								
1 Short Sale Loan Payoff Fee	\$297 per transaction		No Change					
2 Single-Family Loan Payoff Fee	\$150 per transaction		No Change					



# DEPARTMENTAL FEES AND CHARGES

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Service	2014-2015 Adopted Fee	2014-2015 % Cost Recovery	2015-2016 Proposed Fee	2015-2016 Estimated Cost	2015-2016 Estimated Revenue		2015-2016 % Cost Recovery	
					Current Fee	Proposed Fee	Current Fee	Proposed Fee
<b>LOW/MOD INCOME HOUSING ASSET FD - CATEGORY I</b>								
<b>11. Single-Family Loan Payoff Fee</b>								
<b>Sub-total Single-Family Loan Payoff Fee</b>		<b>100.0%</b>		<b>8,970</b>	<b>8,970</b>	<b>8,970</b>	<b>100.0%</b>	<b>100.0%</b>
<b>12. Supplemental Document Processing Fee</b>								
1	City Attorney Staff Time	\$142/hr	\$160/hr					
2	City Housing Staff Time	\$110/hr	\$130/hr					
3	County of Santa Clara Clerk Recorder's Office Fees	Actual costs charged by the County Recorder to the City	No Change					
<b>Sub-total Supplemental Document Processing Fee</b>		<b>100.0%</b>		<b>10,200</b>	<b>9,170</b>	<b>10,200</b>	<b>89.9%</b>	<b>100.0%</b>
<b>SUB-TOTAL LOW/MOD INCOME HOUSING ASSET FD - CATEGORY I</b>		<b>100.0%</b>		<b>635,195</b>	<b>202,470</b>	<b>635,195</b>	<b>31.9%</b>	<b>100.0%</b>
<b>MULTI-SOURCE HOUSING FD - CATEGORY I</b>								
<b>1. Housing Impact Fee Program - Pipeline Annual Fee</b>								
1	City Attorney Staff Time		\$160/hr in excess of 2 hours					
2	City Housing Staff Time		\$100/hr in excess of 13 hours					
3	Standard Transaction		\$1,740 per transaction	139,200		139,200		100.0%
<b>Sub-total Housing Impact Fee Program - Pipeline Annual Fee</b>				<b>139,200</b>		<b>139,200</b>		<b>100.0%</b>
<b>2. Housing Impact Fee Program - Pipeline Application Processing Fee</b>								
1	City Attorney Staff Time		\$160/hr in excess of 7 hours					
2	City Housing Staff Time		\$99/hr in excess of 20 hours					
3	Standard Transaction		\$3,200 per transaction	256,000		256,000		100.0%
<b>Sub-total Housing Impact Fee Program - Pipeline Application</b>				<b>256,000</b>		<b>256,000</b>		<b>100.0%</b>

# DEPARTMENTAL FEES AND CHARGES

# HOUSING

Service	2014-2015 Adopted Fee	2014-2015 % Cost Recovery	2015-2016 Proposed Fee	2015-2016 Estimated Cost	2015-2016 Estimated Revenue		2015-2016 % Cost Recovery		
					Current Fee	Proposed Fee	Current Fee	Proposed Fee	
<b>MULTI-SOURCE HOUSING FD - CATEGORY I</b>									
<b>2. Housing Impact Fee Program - Pipeline Application Processing Fee</b>									
<b>Processing Fee</b>									
<b>3. Inclusionary Processing Fee</b>									
1 City Attorney Staff Time			\$160/hr in excess of 7 hours						
2 City Housing Staff Time			\$99/hr in excess of 20 hours						
3 Standard Transaction			\$3,200 per transaction	48,000		48,000			100.0%
<b>Sub-total Inclusionary Processing Fee</b>				<b>48,000</b>		<b>48,000</b>			<b>100.0%</b>
<b>4. Rental Rights and Referrals Program</b>									
1 Apartment Unit	\$11.75 annually	77.1%	\$12.25 annually	538,049	510,937	532,679	95.0%	99.0%	
2 Mobile Home Unit	\$21.00 annually	66.2%	\$27.00 annually	348,183	226,296	290,952	65.0%	83.6%	
3 Non-Rent-Controlled Apartment Units Note: Formerly Titled "Non-Rent-Controlled Apartments"	\$2.00 annually	63.2%	\$1.95 annually	93,663	95,354	92,970	101.8%	99.3%	
<b>Sub-total Rental Rights and Referrals Program</b>		<b>72.5%</b>		<b>979,895</b>	<b>832,587</b>	<b>916,601</b>	<b>85.0%</b>	<b>93.5%</b>	
<b>SUB-TOTAL MULTI-SOURCE HOUSING FD - CATEGORY I</b>		<b>72.5%</b>		<b>1,423,095</b>	<b>832,587</b>	<b>1,359,801</b>	<b>58.5%</b>	<b>95.6%</b>	
<b>MULTI-SOURCE HOUSING FD - CATEGORY II</b>									
<b>1. Inclusionary Fees</b>									
1 For-Sale - High Rise Not in Downtown Core	\$17.00 per square foot of total living space in entire development. Maximum per affordable unit: \$200,200		No Change						

# DEPARTMENTAL FEES AND CHARGES

# HOUSING

Service	2014-2015 Adopted Fee	2014-2015 % Cost Recovery	2015-2016 Proposed Fee	2015-2016 Estimated Cost	2015-2016 Estimated Revenue		2015-2016 % Cost Recovery	
					Current Fee	Proposed Fee	Current Fee	Proposed Fee
<b>MULTI-SOURCE HOUSING FD - CATEGORY II</b>								
<b>1. Inclusionary Fees</b>								
2 For-Sale - High Rise in Downtown High-Rise Incentive Area	\$8.50 per square foot of total living space in entire development. Maximum per affordable unit: \$65,000		No Change					
3 For-Sale - Low-Rise Condominium/Stacked Flat Units	\$17.00 per square foot of total living space in entire development. Maximum per affordable unit: \$90,000		No Change					
4 For-Sale - Single-Family Detached Units	\$17.00 per square foot of total living space in entire development. Maximum per affordable unit: \$200,000		No Change					
5 For-Sale - Townhouse/Row- House Units	\$17.00 per square foot of total living space in entire development. Maximum per affordable unit: \$120,000		No Change					
6 Rental Units	\$17.00 per square foot of total living space in entire development. Maximum per affordable unit: \$85,500		No Change					
<b>2. Rental Mediation Penalty: Apartments</b>								
1 30 days past due = 25% of principal	Penalties and interest assessed for delinquent permit payment		No Change					
2 60 days past due = 50% of principal	Penalties and interest assessed for delinquent permit payment		No Change					

# DEPARTMENTAL FEES AND CHARGES

# HOUSING

Service	2014-2015 Adopted Fee	2014-2015 % Cost Recovery	2015-2016 Proposed Fee	2015-2016 Estimated Cost	2015-2016 Estimated Revenue		2015-2016 % Cost Recovery	
					Current Fee	Proposed Fee	Current Fee	Proposed Fee

## MULTI-SOURCE HOUSING FD - CATEGORY II

### 3. Rental Mediation Penalty:

#### Mobile Homes

1 30 days past due = 10% of the amount of the fee	Penalties and interest assessed for delinquent permit payment	No Change
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## SUB-TOTAL MULTI-SOURCE HOUSING FD - CATEGORY II

TOTAL DEPARTMENT - NON-GENERAL FUND				2,058,290	1,035,057	1,994,996	50.3%	96.9%
TOTAL DEPARTMENT - Category I				2,058,290	1,035,057	1,994,996	50.3%	96.9%
TOTAL DEPARTMENT - Category II								
TOTAL DEPARTMENT				2,058,290	1,035,057	1,994,996	50.3%	96.9%