

Increasing Housing Choices: How Can the MTW Program Evolve to Achieve its Statutory Mandate?

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Introduction

One of the three statutory goals of the HUD Moving to Work (MTW) demonstration is to “increase housing choices for low-income families.”² The MTW program allows HUD to waive provisions of the U.S. Housing Act of 1937 and various HUD regulations at the request of selected Public Housing Agencies (PHAs or “agencies”) in pursuit of the program’s statutory goals. Additionally, MTW agencies are granted substantial flexibility in how they may apply their funds, as with the potential to interchangeably allocate funds from different sources. In theory, the MTW program’s flexibility could allow PHAs to overcome programmatic barriers to housing choice and mobility, and dramatically expand housing options for low income families in higher opportunity areas.

Sixteen years after the demonstration’s initiation, however, its success in expanding housing choice has remained largely unexamined. Because “housing choice” is fundamental to the program, it is important to evaluate whether this goal delivers clear expectations to housing agencies. MTW offers an opportunity for HUD to build on effective, innovative local models, but this potential may be undermined by HUD’s own lack of leadership in defining this programmatic goal. In particular, there is a need for guidance that clearly and assertively defines “choice” for all MTW participants and holds them accountable for progress toward this

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 - 2 Omnibus Consolidated Rescissions and Appropriations Act of 1996, Pub. L. No. 104-134, 110 Stat. 1321 §204(a) (April 1996).

goal. We also recommend that guidance include a robust mobility component: that is, programming that directly aids families in moving to higher-opportunity neighborhoods.

We focus on housing mobility because “increasing housing choices” should by definition include programs that forge new and better opportunities for families. *Increasing* choice should not mean simply facilitating those choices already available, or reinforcing existing segregative patterns, but rather should further the agency’s fair housing obligations. While “increasing housing choice” may encompass complementary strategies (such as preservation of affordable housing in gentrifying areas), MTW agencies should be more widely implementing mobility programs and other initiatives that help families move beyond entrenched residential patterns and relocate to high-opportunity areas. Lost opportunities to advance housing mobility mean lost connections to quality schools, jobs, and other social capital for many families, even while agencies may be fostering initiatives that distract from, or even undermine, civil rights goals such as integration.

The Government Accountability Office (GAO) has also noted that that “HUD has not clearly defined what the language in some of these [MTW statutory] purposes means, such as ‘increasing housing choices for low-income families.’”³ This definitional vacuum leaves the “housing choices” goal void of measurable criteria, impairing HUD’s ability to assess programmatic outcomes and to ensure that the program operates in accordance with Congressional intent. Given the resulting confusion among PHAs (as described below), it is incumbent on HUD to furnish content for the “housing choices” goal that 1) promotes choice-oriented initiatives by PHAs with measurable outcomes; and 2) aligns such initiatives with fair housing requirements, including the responsibility to affirmatively further fair housing.

In the absence of such guidance, has the MTW program been successful in “increasing housing choices for low-income families”? PRRAC’s initial review of this question in January 2011, based on HUD’s August 2010 report to Congress, suggested that the program had largely failed to deliver on this goal: “For most of the other PHAs reviewed in the study, MTW was not reported to have expanded resident choices, and in some cases appeared to have contributed to the redevelopment of public and assisted housing in the same neighborhoods where it was previously located.”⁴ We also noted that the standard MTW agreement could be construed to permit waiver of key civil rights siting standards.⁵ A more detailed review by the

3 HUD’s Moving to Work Demonstration: Opportunity Exist to Improve Information and Monitoring, GAO-12-490 (April 2012) at 26, *available at* <http://gao.gov/assets/600/590226.pdf>.

4 PRRAC Policy Brief: “Report to Congress: The Moving to Work Demonstration Fails to Increase Housing Choice for Low Income Families” (January 2011), *available at* http://prrac.org/pdf/MTW_Policy_Brief_January_2011.pdf.

5 The MTW legislation does not authorize the waiver of civil rights requirements (including the site and neighborhood standards), and in its 2012 MTW Notice, HUD states clearly that “[p]articipation in the MTW demonstration brings no flexibilities related to fair housing or civil rights requirements. See PIH Notice 2011-31,” and “[p]articipation in MTW does not bring any opportunity flexibility [sic] on regulations outside the 1937 Act. The continued applicability of fair housing and civil rights requirements on PHAs participating in the

Center on Budget and Policy Priorities in September 2011 observed that the trend of transferring funds out of PHA voucher programs had the effect of decreasing housing choices in the program, and found that HUD had approved waivers of Section 8 portability rules for several MTW PHAs.⁶

In spite of these negative reports, we also learned of significant progress on expanding housing opportunities in some agencies (including promising housing mobility efforts in the San Diego Housing Authority). A number of MTW agencies came to the Fifth National Conference on Assisted Housing Mobility in 2012 looking for information to start or augment housing mobility programs in their jurisdictions. We also welcomed HUD's clarification of the civil rights obligations of PHAs, which included specific guidance for MTW agencies.⁷ Additionally, the 2012 MTW NOFA, which invited four new PHAs to join the program, offered an explicit choice-mobility option (ultimately selected by two of the participants).⁸

Encouraged by these trends, we decided to take a focused look at housing mobility-related programming among MTW agencies. The following report examines how choice-mobility is faring in a programmatic landscape where—although fundamental to a statutory goal—it has lacked clear support in federal guidance.⁹ The following report addresses both whether MTW agencies consistently understand efforts to “increase choice” to mean housing mobility efforts: those enabling residents to move to less segregated, higher-opportunity neighborhoods; and to what degree MTW agencies are actually engaged in this type of programming, as reflected in their MTW plans.

Part 1 of this report presents a qualitative inquiry, conducted in mid-2012, into how thirteen MTW agencies in large, highly-segregated cities are expanding housing choices for the residents they serve. This study focused on “mobility” aspects of MTW agency policies as identified by the agencies themselves. Our interviews and data review revealed substantial variation in MTW agencies' understanding of “housing choice” and “residential mobility.” Some agencies identified legitimate mobility efforts related to the goal of increasing choice.

MTW demonstration is explained at length in PIH Notice 2011-31.” HUD Notice PIH-2012-16, “Request for Applications under the Moving to Work Demonstration Program for Fiscal Year 2011,” February 27, 2012. However, HUD Notice PIH 2011-31 at 13 includes explicit “Flexibilities in implementing site and neighborhood standards under MTW” and the Standard MTW Agreement, Attachment D, also contemplates such waivers; see http://portal.hud.gov/hudportal/HUD?src=/program_offices/public_indian_housing/programs/ph/mtw/mtwsa.

- 6 Will Fischer, Center on Budget and Policy Priorities, “Expansion of HUD’s ‘Moving-To-Work’ Demonstration is Not Justified: Other Approaches Would Promote Demonstration’s Goals More Effectively” (Sept. 27, 2011), available at <http://www.cbpp.org/Files/9-27-11/hous.pdf>.
- 7 PIH Notice 2011-31 “Guidance on non-discrimination and equal opportunity requirements for PHAs.”
- 8 HUD Notice PIH-2012-16, “Request for Applications under the Moving to Work Demonstration Program for Fiscal Year 2011,” February 27, 2012, at 5; see discussion in Part 2, *infra*.
- 9 As noted, the 2012 NOFA was a welcome exception, as we discuss further, but its choice-mobility option has been adopted by only two agencies.

These efforts included both strategies designed to connect residents to specific neighborhoods and strategies that aimed to broaden access to housing throughout the area (for example, by addressing affordability hurdles). However, many of the strategies cited as “mobility” efforts were only speculatively related to mobility, if at all. Additionally, the outcomes of strategies in advancing choice and mobility frequently remained unevaluated, at least at this stage.¹⁰ This is problematic because it indicates that the MTW program may include missed opportunities to promote mobility and to learn what works, and so is falling short of its potential for increasing residential choice.

In spite of the lack of clear program definition and performance goals, we found a number of agencies were experimenting with mobility-related programs on a small scale – including mobility counseling, targeted exception payment standards, flexibility with rent caps, landlord outreach, geographic targeting, and assistance with security deposits in higher opportunity areas. These small efforts indicate a foundation and potential for future improvement in the program.

Part 2 is based on an early 2013 overview of current MTW plans at all participating agencies. This research summarizes mobility initiatives described in the agencies’ 2012 plans, and tracks specific aspects of such initiatives, such as counseling and landlord outreach. The research detailed in this section can help HUD assess how widely mobility programming is being implemented, as well as identifying agencies where successful practices in mobility programming may be found and replicated.

While the issues raised in this report merit longer-term inquiry, they show that the MTW program would benefit from clearer guidance addressing the goal of “increasing housing choices,” in particular with regard to including and evaluating mobility strategies. HUD should clarify these expectations for MTW participants. We also recommend that HUD hold agencies accountable for delivering on the “choices” goal (as interpreted in accordance with their affirmative fair housing obligations). In addition, PHAs can better serve their residents—and serve as models for their peer agencies—by strengthening their mobility initiatives and more rigorously assessing outcomes. These recommendations are discussed in more detail at the end of the report.

10 One exception is EuQuant’s recent evaluation of the Atlanta Housing Authority’s efforts to move residents to lower poverty concentration areas. A full version of the evaluation report can be accessed at: <http://www.atlantahousing.org/pdfs/FY%202010%20Annual%20Report%20Appendices.pdf>

PART ONE: WHAT DO PHAs IDENTIFY AS MOBILITY PROGRAMMING?

Background and Goals

The Moving to Work (MTW) Demonstration program is an opportunity for select public housing authorities (PHAs) across the country to have greater flexibility in administering their housing assistance programs. MTW was first authorized in 1996 and is administered by the U.S. Department of Housing and Urban Development's (HUD) Office of Public Housing Investments (within the Office of Public and Indian Housing). Currently, 39 PHAs (a mix of city, county, and state PHAs) are authorized as MTW agencies. MTW status exempts PHAs from many existing public housing and voucher program regulations, and provides greater flexibility around how agencies may use their Federal funding. The intent is that through MTW, PHAs will be able to better identify and meet local housing needs, and will then inform HUD about these innovations.^{11, 12}

At program inception, Congress identified three statutory goals for MTW that continue to the present day and are intended to provide direction for PHAs' more local activities:

1. Reduce cost and achieve greater cost-effectiveness in Federal expenditures.
2. Give incentives to families with children where the head of household is working, seeking work, or is preparing for work by participating in job training, educational programs, or programs that assist people to obtain employment and become economically self-sufficient.
3. Increase housing choices for low-income families.

This report is an initial exploration of PHAs' responses to this third statutory goal. Using interview data from a subset of MTW agencies located in significantly segregated metropolitan areas, this study explores the extent to which MTW agencies focus on increasing resident choice through residential mobility programming. In particular, have MTW PHAs allocated funds and/or implemented programs to expand geographic choice in housing programs, and if so, what have been the outcomes of these efforts? Though there is long-standing interest in residential mobility and the strategies to achieve it, there is still a relative lack of clarity about what PHAs are doing to this end and the particular outcomes and challenges that come from these efforts. Specifically, this project sought to identify:

11 HUD Moving to Work Website.

http://portal.hud.gov/hudportal/HUD?src=/program_offices/public_indian_housing/programs/ph/mtw.

12 HUD. *2011 Moving to Work Conference Report* (Jan. 12, 2012), available at

http://portal.hud.gov/hudportal/HUD?src=/program_offices/public_indian_housing/programs/ph/mtw/training.

- The extent to which MTW agencies in significantly segregated areas have developed programming and/or shifted funds to promote housing mobility among residents.
- Progress that MTW agencies in significantly segregated areas have made in achieving the statutory goal of increasing housing choice.
- The extent to which MTW agencies in significantly segregated areas are seeking or have obtained waivers from HUD site and neighborhood standards.¹³

This project is intended to provide exploratory data on this subset of MTW agencies' activities, and to serve as a springboard for future research and exploration in this area.

Summary of Findings

Our research specifically targeted MTW agencies located in significantly segregated metropolitan areas. Of the 35 current MTW agencies, 14 are located in significantly segregated areas according to 2010 segregation index scores (a measure based on U.S. Census data). Eleven of these 14 agencies agreed to participate in semi-structured interviews for the study, and interview data was supplemented with local PHA and HUD documentation. Although they did not participate in interviews, documents from the Atlanta and Chicago Housing Authorities were also analyzed because of these agencies' size and broad mobility efforts. We explored the extent to which MTW agencies were able to identify mobility programs they have developed in pursuit of the statutory goal of expanded housing choice, and whether they can provide meaningful conclusions about the success of such efforts.

Analysis of interview and archival data indicated wide variation in how agencies understand and define their housing choice and resident mobility efforts. Only some of the strategies cited as mobility efforts were directly connected to mobility, while others were tenuously related to mobility, if at all. Agencies emphasized mobility efforts that aimed to expand resident information and access, including mobility counseling, increased payment standards, landlord engagement, and support services. Some agencies had also implemented strategies that guided residents' movement to specific geographic areas, either in the form of mobility vouchers or through the development of public housing in new neighborhoods. However, a number of agencies mischaracterized as "mobility efforts" indirect approaches with longer-term potential to expand choice (for example, efforts to increase residents' savings and employment status), while some misidentified redevelopment efforts and neighborhood revitalization strategies as "mobility programming." Among the agencies interviewed, five emphasized specific initiatives they had planned or undertaken explicitly related to residential mobility.

13 As noted below, we were unable to obtain conclusive data on this issue, and will defer findings on site and neighborhood standards to a later supplemental report.

Agencies generally noted that their MTW status was helpful in mobility efforts by allowing for greater flexibility between public housing and voucher program participation and allocations, more streamlined processes for increasing payment standards, and more options for subcontracting case management and other support services. Agencies described funding, participant resistance, community resistance, defining geographic boundaries, poor transportation infrastructure, organizational barriers, and information dissemination as challenges they perceived or anticipated in response to mobility efforts. Agencies' general perceptions were that their resident mobility and housing choice initiatives appeared promising but were still largely in their infancy and that only longer term evaluation would be able to identify whether these efforts were effective.

Design and Methods

A qualitative approach – based on semi-structured interviews and critical document review – was used in this exploration of MTW agencies' mobility efforts. This method provides an opportunity to collect rich and nuanced data from a relatively small group of agencies, and is appropriate for this preliminary exploration of trends in MTW agencies' perceptions and activities.

Only MTW agencies that were located in areas of significant racial/ethnic segregation were considered for inclusion in this project, based on the notion that PHAs in highly segregated areas should be more urgently focused on mobility efforts than PHAs in non-segregated areas. The 2010 segregation index score was used to define which PHAs qualified as being located in significantly segregated areas. This segregation index score — the most commonly used measure of segregation between groups in U.S. cities/metro areas — is based on 2010 U.S. Census information, and provides an index score of the relative distribution of two racial/ethnic groups across neighborhoods within a city or metropolitan area¹⁴. These scores can range from 0 (complete integration) to 100 (complete segregation), but are typically a value between these two extremes.

For the purposes of this project, MTW agencies were included in the study sample if they were located in a metro area with a 2010 segregation index score of 50 or higher. Although a metro area has multiple segregation scores depending on differences between different racial/ethnic groups, qualifying scores for this project are based on scores for black-white, Hispanic-white, and Asian-white differences. A MTW agency was included if it was located in a metro area with a 2010 segregation score at or above 50 for *any* of these three between-group differences. Inclusion of county-level MTW agencies with county-level jurisdictions was assessed using the segregation scores for the largest metro area within the county. The three MTW agencies

14 University of Michigan Population Studies Center. New Racial Segregation Measures for Large Metropolitan Areas: Analysis of the 1990-2010 Decennial Census. <http://www.psc.isr.umich.edu/dis/census/segregation2010.html>

representing states were excluded as it was not possible to get an accurate segregation scores for all metro areas within the state. Of the 35 current (as of summer 2012) MTW agencies, 14 met the project eligibility criteria. Please see Table 1 below for a listing of these agencies, the segregation index score for the metro area they are located in, and their participation status. (Please refer to Appendix B for a more complete listing of these agencies' goals, capacity, and MTW status.)

Up to five outreach attempts were made via telephone and email to the primary MTW Contact Person and/or Executive Director for each of the 14 qualifying agencies. Agency contacts were asked whether they would be interested in participating in a short telephone conversation about their efforts related to resident mobility. Potential participants were informed that this was part of a project being conducted by the Poverty and Race Research Action Council, and that a number of MTW agencies from across the country were being asked to participate. As

Table 1. List of all Identified and Participating MTW Agencies

Metro Area	2010 Black-White Segregation Index Score¹⁵	MTW Agency	Participation
Participating Agencies			
Philadelphia, PA	68.4	Philadelphia Housing Authority	Two individual interviews
Pittsburgh, PA	65.9	Housing Authority of the City of Pittsburgh	Individual interview.
Baltimore, MD	65.4	Housing Authority of Baltimore City	Individual interview
Cambridge, MA	64.0	Cambridge Housing Authority	Individual interview
New Haven, CT	63.7	Housing Authority of the City of New Haven	Individual interview
Washington, DC	62.3	District of Columbia Housing Authority	Individual interview
Oakland, CA	62.0	Oakland Housing Authority	Individual interview
Louisville, KY	58.1	Louisville Metro Housing Authority	Panel interview
Charlotte, NC	53.8	Charlotte Housing Authority	Panel interview
Minneapolis, MN	52.9	Minneapolis Public Housing Authority	Panel interview
San Diego, CA	51.2	San Diego Housing Commission	Individual interview
Agencies that Declined Participation in Interviews			
Chicago, IL	76.4	Chicago Housing Authority	n/a
Atlanta, GA	59.0	Atlanta Housing Authority	n/a
Orlando, FL	50.7	Orlando Housing Authority	n/a

15 The black-white segregation score was consistently higher than the segregation scores for either Hispanic-white or Asian-white differences. As such, it was this value that consistently met inclusion criteria.

noted in Table 1, of the 14 possible agencies, 11 participated in the interviews for an overall response rate of 79%. Among the three agencies that did not participate, Atlanta declined the interview but did forward an evaluation of their mobility efforts; Orlando declined the interview noting that due to a recent merger with another housing authority, they had had to delay implementation of many of their MTW activities; and Chicago did not respond to outreach contacts. The 11 agencies that participated in interviews represent a range of geographic regions, city size, and PHA size and jurisdiction.

Interviews took approximately 30-50 minutes to complete, and were conducted in April and May 2012. Please see Appendix A for a copy of the interview script used to guide these semi-structured interviews. In some cases, PHAs opted to assemble a conference call that included a panel of agency staff who could speak to various aspects of agency efforts. In other cases where only one agency representative was interviewed, several participants asked that subsequent conversations be held with other contacts from the agency or with agency vendors to provide more details on specific agency efforts.¹⁶

All interview data were supplemented with the most recent agency MTW Annual Reports (in most cases, reports from 2010 and/or 2011), as well as documentation from the 2011 and 2012 MTW Newsletters (produced by HUD) and the 2011 MTW Conference Report. Annual Report and evaluation¹⁷ documents were also analyzed for the Atlanta and Chicago Housing Authorities that did not participate in interviews, so as to obtain as complete a picture as possible about mobility efforts in all identified cities.¹⁸

All interview and archival data was analyzed to identify preliminary themes related to mobility efforts and outcomes across metro areas. These themes are described below, followed by some overarching conclusions and possible avenues for future investigation.

Results: Themes from MTW Agencies' Mobility Efforts

Varied Ideas on What Constitutes Resident Mobility

At the most basic level, the interviews highlighted that agencies had very different conceptions about what was meant by the term 'housing mobility' and as such, had developed programming that largely reflected these different ideas. At a minimum, this suggests that HUD needs to better define its expectations for "increasing housing choice for low-income families." It will remain difficult for either PHAs or HUD to evaluate PHA performance towards

16 Although two interviews were conducted with Philadelphia as part of this study, for most other agencies these types of additional interviews are presented as a possible next step.

17 Evaluation documents were only available for the Atlanta Housing Authority.

18 Annual Reports and other documentation were not available for the Orlando Housing Authority, and as such, they are not included in this report.

“increasing housing choice,” or produce best practices in this area, until this term is clarified (and is consistently understood to include true mobility efforts). As we note in the introduction to this report, the current lack of clarity around “increasing housing choice” should be addressed through guidance that 1) promotes choice-oriented initiatives by PHAs with measurable outcomes; and 2) aligns such initiatives with fair housing requirements, including the responsibility to affirmatively further fair housing. Specifically, the findings below indicate that guidance is needed to clearly communicate the definition of “choice” and “mobility” that HUD provided in the 2012 NOFA, as countering restrictive or segregative residential patterns and providing avenues to economic and racial diversity;¹⁹ and to avoid conflation between the statutory goal of increasing choice and that of promoting self-sufficiency.

Across the board, PHAs vary greatly in terms of how they understand residential mobility, what should be done about it, and the extent to which agencies acknowledge residential segregation and mobility as important local housing issues. These varied definitions illustrate the complexities underlying mobility efforts and the need for clearer guidance from HUD. The extent to which PHAs understand the MTW goal to increase housing choice as entailing residential mobility is inconsistent, with some agencies connecting *choice* and *mobility* more explicitly than others. Moreover, agencies vary in the degree to which they have aligned their local goals and efforts with this MTW statutory goal compared to the other two statutory goals.

In some cases, agencies were able to identify mobility efforts and to equate residential mobility with increasing resident choice. In these cases, agencies made a somewhat direct, often explicit connection between the MTW statutory goal to increase housing choice and their localized efforts to increase residents’ choices about where to live as key efforts influencing residential mobility. This conception of “increasing choice” through mobility included both strategies to connect residents to specific neighborhoods and strategies to broaden access to housing throughout the area (for example, by addressing affordability hurdles).

Specific strategies identified by the agencies included: efforts to increase residents’ knowledge of area neighborhoods (often referred to as ‘arming’ participants with knowledge) through counseling programs; efforts to increase residents’ purchasing power in and presumed access to certain neighborhoods by increasing payment standards and rent contribution caps; expanding unit availability into new or underrepresented neighborhoods, as by building relationships with local landlords; and initiatives that specifically incentivized moving to new neighborhoods. These targeted incentive programs (discussed in more detail below) were frequently defined as pilot programs and were combined with other test efforts such as term-

19 NOTICE PIH-2012-16 (Feb. 27, 2012) at 5: “An increase in housing choice is defined as providing more types and locations for assisted housing in areas where affordable housing may not be many, and may entail geographic mobility programs that result in residents moving to more racially or economically diverse neighborhoods.”

limits and wrap-around services. Depending on location, these incentive programs spanned both Housing Choice voucher holders and public housing residents as the target population, and sometimes identified specific subpopulations within these broader groups (e.g., single parent households, long-term residents, etc.).

In addition to describing the above strategies, however, a number of agencies appeared confused as to what mobility programs entail, and used “mobility” as a catch-all concept encompassing any efforts aiming to strengthen tenants’ capacity, regardless of the fair housing impact. For example, agencies identified efforts to improve participants’ self-sufficiency (through education, job skills training, access to mental health supports, etc.) as a kind of mobility strategy, because of the potential to eventually increase purchasing power and interest in moving to new neighborhoods. While it is possible that these strategies will indirectly “increase choice” for some tenants, they are not mobility programs and should not substitute for them in advancing the particular statutory goal of increasing choice.²⁰ Other agencies identified as “mobility” programs efforts that were unrelated to mobility and solidified existing segregated residential patterns: for example, strategies of redevelopment in high-poverty neighborhoods, which they said were intended to give PHA participants more viable options to stay in their current neighborhoods. While redevelopment and self-sufficiency initiatives may help many tenants and offer a valuable complement to mobility efforts, the inability to distinguish among these strategies prevents accurate program evaluations, and is likely to create an imbalanced portfolio of initiatives that fails to promote residential choice. Furthermore, “housing choice” should be interpreted in light of HUD’s and the PHAs’ AFFH obligations, which require that the agencies address segregative and exclusionary patterns.

In addition to variation in strategies, there is a lack of consensus in the terminology used to describe mobility efforts and related neighborhood phenomena. Throughout the interviews and document reviews, agencies referred to mobility efforts as informed by neighborhood characterizations they described as: impacted vs. non-impacted neighborhoods, high vs. low density neighborhoods, deconcentration efforts, high vs. low poverty areas, county vs. city placement, low vs. high opportunity neighborhoods, and areas of minority concentration. This last term was used by only two agencies (and only in the context of other, more frequently-used references to poverty concentration areas), thus emphasizing that even in metropolitan areas with significant racial/ethnic segregation, PHAs’ explicit and public focus is on poverty rather than on racial composition.

Specific Strategies

20 Additionally, characterizing self-sufficiency strategies as mobility- or choice-related conflates the statutory goal of housing choice with the second MTW goal of self-sufficiency and work programs; the legislation explicitly sets apart housing choice as a distinct and equally important aim.

All of the agencies interviewed identified at least some efforts that they connected to increasing residential mobility. However, many were also quick to point out that their efforts were not necessarily mobility initiatives per se, but that one of the outcomes of these strategies was potentially greater mobility among participants. It is unclear whether agencies made this distinction because they conceived of a 'true' mobility program as being a separate and distinct effort, because they did not yet have outcome data on whether the efforts cited were empirically connected to resident mobility, because explicitly labeling something as a mobility effort carried unwanted connotations or administrative implications, or for other reasons.

The sections below detail the mobility strategies outlined by participating agencies. As noted above, these include strategies seeking to connect residents to specific, underrepresented neighborhoods and strategies that aim to broaden access to housing throughout the area. In addition, Table 2 at the end of this section outlines programs cited by interviewed agencies as *specific mobility initiatives*. Interestingly, many of the strategies used in these more explicit initiatives were also cited by other PHAs as more indirect mobility strategies. This seems to speak to the phenomenon noted earlier wherein agencies have varied conceptions around what in fact constitutes a mobility initiative.²¹

Although we indicate where strategies are tied to a specific program or target population, it is notable that the mobility strategies outlined by agencies could not be consistently tied to either voucher or public housing programs. This may be partly a result of MTW flexibility and the ability of agencies to use funding flexibility and exemptions from federal housing regulations to more effectively blur the lines between voucher and public housing programs.

I. MOBILITY STRATEGIES

(1) Mobility Counseling

Five of the agencies interviewed indicated some level of mobility counseling offered to their participants, although what was included under these services varied widely across agencies. In addition, both Atlanta and Chicago indicated efforts in mobility counseling.

San Diego, New Haven, and Minneapolis are the only agencies that noted specific funding that had been allocated to knowledge-building efforts including mobility counseling. New Haven currently subcontracts to a vendor who goes into low poverty concentration neighborhoods to identify rental units, manages a list of available units in these areas, and helps voucher holder participants to consider these neighborhoods. This service will assist in unit showings and support participants throughout the lease-up process for units in low poverty areas. San

21 Though programming and activities based on document review are included throughout this report for Atlanta and Chicago (which were not interviewed), they are not included in Table 2, as document review alone could not provide information on agency perceptions of these efforts and as such, what these agencies would have defined as specific mobility initiatives.

Diego's mobility counseling services are provided in-house as part of their larger Choice Communities Initiative (see Table 2). San Diego has noted that while they do not have a mobility counseling service per se, they have allocated funds to produce booklets that detail the areas and amenities of nine Choice Communities low poverty neighborhoods. All current and incoming Housing Choice Voucher program residents are notified of this booklet and are sent one if interested. A Housing Assistant (employed by the San Diego PHA) is then available to help residents with understanding the booklet content, answering any questions, and if they are interested, assisting them in their search for housing in one of these nine neighborhoods. Minneapolis also offers targeted (and funded) mobility counseling as part of their Special Mobility Voucher initiative (see Table 2), offering neighborhood profiles for each low poverty option neighborhood and providing move-in counseling and assistance for program participants, however, this service is only available to persons who are selected for the Mobility Voucher program.

Chicago indicated that they made mobility counseling services — including tours to opportunity and low-poverty communities²², housing search assistance, housing and tenancy workshops, and \$500 toward security deposit, furniture, or transportation assistance — available to Housing Choice Voucher recipients. Chicago also noted that mobility counseling services included post-move transition assistance.

Baltimore noted a specific mobility counseling service they had funded to provide families with information and support to move to low impact communities (noted as being communities primarily outside the city), but these services are currently only available to residents covered under the Thompson Consent Decree.²³ Baltimore agency staff noted that although they would ideally like to expand mobility counseling services to all their residents, at this time funding prohibited such an expansion to the broader population. Atlanta indicated that 27 months of “resettlement coaching and [housing] counseling” were made available to families who were relocating from select public housing developments as part of their Quality of Life initiative.

At the other end of the spectrum, at the time of our survey, Philadelphia stated that it did not have a separate mobility counseling program. Although the agency emphasized procedures it identified as “mobility counseling” are incorporated into its standard briefing meetings with all

22 The Chicago Housing Authority defines an Opportunity Area “as a community with less than 23.49% of individuals having income below the poverty level and with no more than 30% of the resident households being African American. A Low-Poverty Area is a community where the percentage of households below the poverty level is less than 16%”. Cambridge Housing Authority FY2011 Annual Report. http://www.thecha.org/pages/plans__reports__policies/40.php.

23 See generally, *New Homes, New Neighborhoods, New Schools: A Progress Report on the Baltimore Housing Mobility Program* by Lora Engdahl (PRRAC and the Baltimore Regional Housing Campaign, October 2009), www.prrac.org/pdf/BaltimoreMobilityReport.pdf.

Housing Choice Voucher participants, in fact, those efforts did not appear to go beyond standard briefings. Subsequent to our survey, however, the Philadelphia Housing Authority has announced its commitment to launch a new housing mobility counseling program in 2013, in cooperation with other PHAs in Southeast Pennsylvania.

(2) Expanded Payment Standards and Rent Caps

Another frequently cited strategy related to increased resident choice was expanded payment standards. (For purposes of evaluating the demonstration, it is important to note that HUD may approve exception rent areas even for non-MTW agencies. However, several of the agencies that cited increases in payments standards said that they were able to do so in a more streamlined manner because of their MTW status, which appeared to allow for greater agency discretion in determining these exception rent areas and establishing corresponding payment standards.²⁴) Six of the agencies interviewed noted that they have increased allowable payment standards on rents in certain areas throughout the city in order to increase voucher holders' access to areas with higher rent costs. Minneapolis is currently in the process of negotiating with HUD about establishing exception rent areas in the city, and Pittsburgh is currently considering resurrecting exception payment standard areas (which had been in existence, but were ended in 2006 as a cost-savings measure). Louisville has increased allowable payments to 105% of fair market rent (FMR) for certain exception payment areas (which interviewees stated reflected owner-occupied median values), though this option is limited to persons in their Section 8 homeownership program. San Diego has increased its payment standard by 20% (to 120% of FMR) in those communities identified as part of the Choice Communities initiative, and New Haven has expanded the payment standard from 120% of FMR to 150% for certain units: units with unique accessibility features (e.g., wheelchair accessible, etc.); 4+ bedroom units; units in neighborhoods with low poverty concentration; units in projects that are a part of neighborhood revitalization efforts; or units in mixed income housing sites. Charlotte is planning to expand the number of exception rent areas in the city from 5 to a number of additional areas that appear to be inaccessible on account of rental costs. In this case, the payment standard would be increased to 113-130% of the FMR. Baltimore has also expanded its allowable payment standards, but as with the mobility counseling, only for families that have fallen under the Consent Decree. Finally, Washington, DC has recently done an analysis of neighborhood-by-neighborhood rents in each neighborhood in the city, and has determined allowable payments standards based on these results (with some higher and some lower than the standard FMR).

In addition, documentation from both Atlanta and Chicago indicated use of expanded payment standards toward meeting the MTW statutory goal to increasing housing choice. Atlanta has worked with a third-party real estate market research firm to establish submarket

24 Minneapolis had a slightly different perspective on this topic, noting that they were still awaiting HUD's decision on their application for exception rent areas.

payment standards based on local market conditions throughout the city, noting that such rates will allow families broader access to rental housing in low-poverty communities. With a similar mobility justification, Chicago established exception payment standards to be up to 300% of the established payment standard.

One additional related strategy highlighted only by San Diego as part of their “Choice Communities” program was the creation of a security deposit loan program to provide non-interest, low payment loans to participants to put towards security deposits (which are presumably higher in low poverty Choice Communities). The program is set up to be a self-sustaining, revolving pool, and as with the other strategies, provides residents with resources to provide improved access to specific neighborhoods.

In addition, two agencies had expanded the allowable percentage for tenants’ rental contributions:²⁵ San Diego and Pittsburgh both have recent initiatives to expand the allowable tenant rent contribution to be a 50% cap (as opposed to 40%). In Pittsburgh, this expansion applies on a case-by-case basis to any Housing Choice Voucher participant, whereas in San Diego, it can only be accessed if residents move into one of the nine Choice Communities neighborhoods. Both agencies noted that residents are given counseling about the implications of going above the standard 40% rent cap, and that in cases where this option has been accessed, most families have only gone into the 41-45% range. Although both agencies explained that this rent cap increase has not been utilized by the majority of eligible families, they also noted that it has been beneficial in eliminating some of the apparent arbitrariness of the 40% limit and allowing families to access improved housing stock. The Pittsburgh and San Diego agencies also noted that to date, families who had utilized the expansion had not experienced subsequent issues with housing stability.

The agencies that highlighted any of the above rent expansion initiatives generally noted that they had been largely implemented in response to participant feedback that certain units and certain neighborhoods were generally inaccessible because of allowable rent and contribution guidelines. Thus the assumption is that such rent and contribution increases will expand participants’ purchasing power and provide increased choice in these formerly inaccessible areas.

(3) Landlord Outreach and Expanded Unit Choice

Another common strategy noted by MTW agencies in terms of increasing residents’ housing choices - and as a result, their mobility decisions – were efforts related to increasing agencies’

25 However, it is possible that these initiatives are driven primarily by agency cost concerns, and programs placing this significant financial burden on families should not be viewed as mobility efforts on par with, for example, increased payment standards.

scattered-site portfolios and building relationships with landlords in new areas. These efforts varied by program funding stream and by local factors such as the extent to which PHA residents were already spread across the agency's area of jurisdiction.²⁶

Louisville has been actively working on expanding its scattered-site portfolio (largely a result of the agency's one-for-one replacement strategy for all public housing units that have been torn down), concentrating particularly on lower poverty neighborhoods that have not traditionally had public housing. The agency has focused on building relationships with local landlords to secure units in these areas, and notes that as a result, PHA residents have increasing options about where to live. Louisville is also strict about putting no more than 10 scattered-site units in any particular area so as to avoid potentially creating new areas of public housing concentration. Washington, DC has been working to build relationships with landlords in rapidly gentrifying neighborhoods as a way to preserve affordable housing in these areas, and to ensure that residents have access to communities. Charlotte noted that one of their public housing strategies has been to buy properties in higher income areas. Similarly, Philadelphia noted that while they did not define it as an explicit mobility initiative, maintaining a broad scattered-site public housing portfolio (one that has units in all but one neighborhood in the city) was a critical component of supporting residents' choices about where to live; the interviewee stated that the largest concentration of voucher holders was in the Northeast section, which many residents were drawn to because they perceived it as having better schools and more green space. Minneapolis noted that having landlords who have successful experiences with voucher holders is important to expanding their Section 8 program, and as such, they are spending time and resources to build relationships in low-poverty neighborhoods identified as part of the Mobility Voucher program catchment area. Atlanta also noted establishing and maintaining long-term relationships with landlords, property management companies, and others in the rental housing industry as an important component of their poverty deconcentration efforts.

(4) Neighborhood Limits on Voucher Use

Compared to the many agencies that cited access- and capacity-expanding activities as key strategies for increasing residential mobility, fewer noted strategies that specifically guided residents' relocation to a particular area. Of the agencies interviewed, only Minneapolis and Charlotte noted specific mobility efforts limiting the use of vouchers to a particular area. Minneapolis' Mobility Voucher program (see Table 2) issues mobility vouchers that can only be used in specific low-poverty neighborhoods. Minneapolis also cited a small mobility initiative that they had administered in response to a tornado last year, administering mobility vouchers

26 Although Section 8 voucher holders are free to move to any community, most of the PHAs we interviewed described mobility efforts within their PHA's area of jurisdiction – usually the city itself or in some cases, the county in which the PHA is located.

to displaced families that could only be used in low-poverty areas. Similarly, Charlotte's RISE Program (see Table 2) was to have their experimental group be relocated to areas with low poverty concentration.

San Diego's Choice Communities program is slightly different in that it does not explicitly issue vouchers to be used in particular neighborhoods, but instead provides incentives for low-poverty moves. If voucher program residents wish to access other aspects of the Choice Communities program such as the security deposit loan program or the expanded payment standards or rent cap, they must move to one of the nine low poverty neighborhoods identified as Choice Communities.

(5) Development in New Areas

Several agencies specified public housing development in new neighborhoods as one strategy for increasing resident mobility. Washington, DC and New Haven specified efforts to develop project-based housing in new neighborhoods through HOPE VI and other initiatives as a way to potentially expand residents' opportunities to new areas. Washington DC stated that it was working to put public housing subsidies into private developments including those in wealthy or gentrifying neighborhoods. Atlanta noted the use of project-based rental assistance in partnership with private developers to establish new properties in mixed income communities, and Chicago described their establishment of 30-year project based voucher commitments as a mechanism for ensuring expanded access to high quality housing. Oakland noted that though it had not yet actively begun efforts to this end, one of their development priorities was to explore the establishment of project-based housing in lower poverty neighborhoods where they did not currently have many housing choices.

II. OTHER AGENCY-IDENTIFIED STRATEGIES

As noted in the introduction to this section, a number of agencies identified certain program aspects as "mobility strategies" even though it was unclear what, if anything, those services contributed to mobility or increased geographic choice. Again, this underscores the need for HUD to provide clear parameters for activities that "increase housing choice."

(1) Supportive Services.

Supportive services were frequently cited as an element of mobility initiatives whether or not they were tailored to mobility outcomes. In some instances, these services were intended to facilitate moves to new areas, but in others, they aimed generally to strengthen individual tenant capacity without an explicit focus on mobility. Generally, the goals and strategies of these supportive services did not seem to be markedly different or more focused on mobility than other intensive case management services.

Minneapolis noted that families in their Mobility Voucher program received very intensive case management initially which tapered over time in frequency and intensity, and was also in the process of working with Minneapolis' broader FSS program to provide specialized skills-building and resource expanding workshops to participants. Both of the special mobility initiatives in Cambridge have a strong supportive service element, consisting of intensive case management services provided by area social service providers that focus on helping residents to build job skills, obtain employment, access medical and mental health services, and access other resources and services that will enable them to maintain their position in the program and eventually, to be able to move out of subsidized housing. New Haven is also providing intensive in-house support services through their CARES Initiative to assist residents in building greater self-sufficiency skills. Extensive wrap-around support services (either to be offered directly through the Charlotte PHA or as part of a subcontract to a local social service agency) were part of the planned RISE Program.

Moreover, several of the agencies (Philadelphia, Louisville, Charlotte, Pittsburgh) that did not currently have explicit mobility initiatives, still pointed out that both public housing and voucher program residents' access to FSS services offered through the agency could have an impact on their current and future opportunities, including what neighborhoods they had access to and chose to live in.

(2) Strategies to Increase Long-term Purchasing Power

Several PHAs also described what they termed more 'backdoor' approaches to resident mobility that were rooted in incentives for residents to increase their savings, a characterization reliant on the assumption that residents would accumulate purchasing power and use it to move to other neighborhoods through their own initiative.²⁷

Additionally, both Cambridge and New Haven equated savings incentives connected with recent term-limit initiatives (see Table 2) as either directly or indirectly related to resident mobility. Cambridge explained that the escrow accounts and cash incentives made available to Career Family Opportunity and Family Opportunity Subsidy Program participants were intended to support residents' savings and at the end of their term limit, to be able to move to the community of their choosing. Similarly, at the end of their term limit, participants in New

27 For example, Minneapolis noted their working family incentive, which provides a 15% deduction from a household's gross annual earned income and should theoretically allow the family to put more money into savings. Cambridge described a similar logic wherein streamlined rent calculation and deduction formulas (based on income categories instead of exact percentage calculations) and a two-year recertification process may allow families in both public housing and voucher programs to put more money into savings. San Diego indicated similar savings possibilities that may come from streamlining measures to their public housing recertification processes, including ignoring assets for which the cash value is less than \$10,000. Cambridge and Pittsburgh also noted that recent policies to increase the minimum rent standards may push some people to seek out employment with direct impacts on earnings and potentially indirect impacts on housing and mobility choices.

Haven's CARES Initiative are eligible to receive a lump sum escrow amount that is equal to a full year of their subsidy. As with Cambridge, one assumption is that this lump sum will allow residents' greater choice and mobility opportunities after leaving the program.

(3) Redevelopment Strategies

Finally, a number of agencies noted an emphasis on reinvestment in existing high-poverty neighborhoods and participation in neighborhood revitalization efforts and mischaracterized these as "mobility" efforts. Philadelphia, Pittsburgh, and Washington DC all noted redevelopment efforts undertaken in high and medium poverty neighborhoods, and New Haven's CARES Initiative is located on a public housing redevelopment site, and residents will move to this newly redeveloped site as part of their participation in the program.

The Effects of MTW Authority on Implementation of Mobility Initiatives

Given that this study was conducted among a subset of MTW agencies, it begs the question of how these agencies' MTW status supported these mobility initiatives. On the most fundamental level, nearly all of the agencies noted that MTW flexibility allowed them to move funding between public housing and Housing Choice Voucher programs, and to be more intentional about blurring these program lines. Oakland mentioned recent agency efforts to provide Housing Choice vouchers to certain public housing residents as a means of increasing mobility out of public housing.

In addition, as noted above, several of the agencies that cited increases in payment standards were able to do so in a more streamlined manner because of their MTW status, which appeared to allow for greater agency discretion in determining these exception rent areas and establishing corresponding payment standards. New Haven noted that its MTW status had allowed for greater flexibility in subcontracting mobility counseling services to outside vendors. Finally, Minneapolis noted that they were only able to administer the tornado response mobility vouchers because of their MTW status, noting that had they not had MTW status they would have had to have a public hearing before administering the vouchers and that this would have taken too long given families' crisis needs.

Table 2. Specific Mobility Initiatives Cited by PHAs

Administering PHA	Program	Description	Agency-Identified Challenges	Status
Housing Authority of the City of New Haven	CARES Initiative	A 7-year term-limit program for persons classified as work-eligible. Housing is located on a public housing redevelopment site. Combines wrap-around support services focused on increasing self-sufficiency and an escrow account that may be accessed at the end of the term limit for up to one full year of the subsidy amount.	Unsure if term limit approach will be effective.	Slated to begin late 2012.
Cambridge Housing Authority	Career Family Opportunity Program	A 5-year term-limit program for single parent households in public housing (later expanded to voucher program participants also). Run in conjunction with a local social service provider, the program provides intensive support services and incremental cash incentives to help participants achieve regular employment and other self-sufficiency goals.	Very expensive, service intensive program. Awaiting evaluations pertaining to ROI and qualitative outcomes among participants.	Currently in Year 2.
Cambridge Housing Authority	Family Opportunity Subsidy Program	A 10-year term-limit program for families coming directly out of the shelter system. Run in conjunction with a local social service provider, the program offers intensive case management, job skills and self-sufficiency training. Participants initially move to a sponsor-based voucher unit during which time they are given a subsidy budget with which to make low-risk budgeting decisions. The goal is to move participants to a participant-held voucher within two years of entry and to move out after 10 years.	Target population has more intensive service needs than other housing populations, and may require revisions to the case management services. Changes in the social service providers' operations required that the program be placed on hold.	In Year 2, but currently on hold.

Administering PHA	Program	Description	Agency-Identified Challenges	Status
Charlotte Housing Authority	RISE Program	A pilot program consisting of an experimental group receiving a mobility voucher (to be used only in low poverty areas) plus wrap-around self-sufficiency support services, a comparison group of current HCV participants (residing in any neighborhood) enrolled in the Family Self-Sufficiency (FSS) program, and a control group of HCV participants not participating in FSS.	Adequate sample sizes that would have provided valid and generalizable findings amounted to unfeasible costs, and the program was put on hold indefinitely.	Not implemented due to funding issues.
San Diego Housing Commission	Choice Communities	A four-prong approach consisting of (1) an information booklet describing Choice Communities low poverty areas, (2) increased payment standards in Choice Communities, (3) a security deposit loan program to be used in Choice Communities, and (4) affordability caps expanded to 50% in Choice Communities. Participation is open to any new or existing HCV program resident.	Do not yet have data on which strategies are most effective.	Currently in Year 2.
Minneapolis Public Housing Authority	Mobility Voucher Program	A mobility voucher issued to single-parent households on the waitlist who are currently employed or who will agree to find employment within 3 months of moving. Vouchers must be used in specified low poverty neighborhoods. Participants receive mobility counseling and case management services to assist with move-in and to support stability in these new neighborhoods.	Low interest from waitlist applicants; may consider expanding eligibility to current voucher holders (which will require some shifts in the incentive structure).	Currently in Year 2.

Perceived Challenges to Mobility Efforts

Many of the conversations with MTW PHAs also highlighted particular challenges that agencies perceive in response to mobility efforts. These are summarized below.

Funding

Several agencies noted the impact of state and federal budget cuts (actual and/or anticipated) on the full implementation of mobility efforts. Some agencies noted that while they wanted to pursue innovative strategies, this was also challenging in the face of budget cuts and insecurities. Several agencies noted that ideally, they would like to pursue further innovations, but did not want to take risks and/or did not have the implementation capacity given the current financial climate. In the case of Charlotte, lack of funding was the primary reason that their RISE Program was not initiated.

In a similar vein, some agencies noted that they did not have the resources to carry out the kind of detailed evaluations of mobility programs as they would hope to. Both Cambridge and Charlotte noted that they had been able to access local universities and graduate students as one means of low/no cost evaluation and research capacity.

Community Resistance

Agencies – particular those making concerted efforts to increase residents' access to low poverty neighborhoods – noted a fair amount of resistance from landlords and from current residents in these areas about having subsidized housing in their neighborhoods. Both Baltimore and Minneapolis specifically mentioned spending time reaching out to low poverty neighborhoods – connecting with landlords and developers, attending community meetings, etc. – educating people on the screening processes and expectations of program participants. Both agencies noted that while there were still some neighborhoods that appeared more resistant to agency programs, in general such outreach appeared to lessen this opposition, and would hopefully improve the opportunities and reception to participants as they moved to these areas.

Area Definition

Although not expressed as one of the leading challenges, some agencies pointed out that it was sometimes challenging to define exactly which areas should be targeted as part of mobility efforts. Some agencies used zip codes to define areas of high/low poverty (and other mobility parameters) while others used census tracts. Charlotte noted that they were currently in the process of changing their concentration areas from zip codes to census tracts in an attempt to maintain more nuanced information about housing choices and opportunities in a given area. Washington DC noted that some areas of the city were gentrifying so rapidly that

current zip codes and census tracts did not accurately reflect patterns, and that any mobility initiatives had to account for these anticipated neighborhood shifts.

Transportation

New Haven, Louisville, and Charlotte all noted that the city's limited public transportation infrastructure appeared to be a barrier to residents wanting to move to certain areas. Agencies noted frustration over this as it was a factor that certainly appeared to influence residents' housing choices, but was not something that the PHAs had any direct control over.

Organizational Barriers

Several PHAs noted that recent organizational restructuring and shifts in leadership had prevented some mobility initiatives from taking root and/or had changed the overall direction of an agency's strategic priority areas. In this case, the flexibility afforded through MTW may not have been entirely welcomed as some agencies remarked that it meant that shifts in leadership could change overarching organizational goals and in some cases had de-prioritized mobility initiatives. However, at least one agency noted the reverse of this, commenting that changes in organizational leadership had led to a prioritization of mobility initiatives.

Information Dissemination

A few agencies noted challenges in disseminating information about new programs and initiatives to eligible participants. Washington, DC explained that it was particularly difficult to get information to existing program participants (as they may not be looking carefully at recertification materials, etc.), and several agencies noted that it is easiest to get information to participants at the initial move-in briefing. San Diego did note that they had still had a fair amount of response from existing program participants about options under the Choice Communities program.

Participant Resistance

Eight of the participating agencies – a significant majority – cited some degree of perceived resistance or hesitancy from residents about moving out of old communities and into new neighborhoods. Several agencies noted that a number of residents (both voucher holders and public housing residents) had expressed a preference to stay in the areas they were most familiar with and had established social networks in. Minneapolis cited this as one of the primary reasons they believed waitlist applicants had not been more willing to participate in the Mobility Voucher program.

Cambridge noted a somewhat unique paradox wherein some residents (particular public housing residents) did not want to leave Cambridge on account of participants' established social networks, and the good schools and amenities available throughout most of the city,

however increases in Cambridge living expenses (including rents, but also childcare and other costs) appeared to be forcing some residents to move to neighboring cities with lower rents and poorer schools/amenities.

Site and Neighborhood Standards

In this exploratory set of interviews, only a few agencies provided responses as to whether they had sought or obtained a waiver from HUD site and neighborhood standards for any of their current or past development projects. Louisville indicated that they had thought about potentially pursuing a waiver but had not at this time. Pittsburgh noted that they had obtained a waiver from these standards in their original MTW Agreement and that this had carried over into Attachment D of their 2008 Agreement, but that they had not had to utilize the waiver as the majority of their development and rehab efforts has all fallen in areas that would not have required a waiver. Similarly, Charlotte indicated that they had modified their site selection standards for their project-based programs, however, the extent to which this qualified as an explicit waiver from HUD site and neighborhood standards as well as the extent to which this had been used on new and rehab projects was unclear. A fuller inquiry into the extent of site and neighborhood standards waivers remains to be done.

Research Conclusions

Revisiting the aims of the project, based on these interviews and supplemental documents, *to what extent have participating agencies developed programming and/or shifted funds to promote housing mobility among residents?* The answer to this is complex. All of the participating agencies highlighted a number of initiatives that they connected to residential mobility. However, as cited earlier, comprehension of mobility programming and the specific strategies used to achieve mobility varied considerably, and most efforts were not particularly strong. Some agencies were able to identify mobility efforts connecting residents with, or expanding access to, new neighborhoods; but many were inclined to claim mobility “credit” for policies that broadened housing choice only speculatively, if at all. One result of this confusion that in several instances, agencies with similar strategies (for instance FSS programming) differed in how they attributed these to mobility initiatives.

Where housing mobility is accurately defined, it appears that fewer agencies have incorporated this as a separate and explicit priority area. To the extent that “expanding housing opportunity” has an explicit fair housing component, it is interesting that very few of the participating agencies spoke of the racial/ethnic composition of neighborhoods at all. Any mobility initiatives that are underway are explicitly focused on poverty deconcentration and have not measured the effects of these efforts on racially segregated communities.

To answer the question, “*what progress have agencies made in achieving HUD’s statutory requirement to increase housing choice?*”, in most instances it simply seems that it is too early to tell. Most of the housing choice efforts noted were still in their infancy, and it would be at least another year (if not more) before agencies would have clear evidence about program uptake and stability. At least anecdotally, most agencies that had instituted increased payment standards noted that residents appeared to be taking advantage of this option (based on Housing Assistance Payment records). Agencies also noted that residents generally appeared to be participating in support services, and in those agencies where they were offered, to be utilizing mobility counseling and mobility resources. However, data that can speak to whether these efforts actually led people to expand their housing choices and to ultimately move to new areas has not yet been collected and/or analyzed. One exception to this was Atlanta in which an external evaluation of agency MTW efforts found that among families that had been residing in select public housing sites in 2004 and relocated after the demolition of these sites, the average neighborhood poverty rate among residents decreased from 56% in 2004 to 29% in 2010.²⁸ Nearly all of the participating agencies stressed that they wanted to know whether their strategies were effective in increasing housing choice, but that many of these outcomes would not be measurable until programs and initiatives had been underway for several more years.

In general, from the interviews it seemed apparent that participating agencies were genuinely interested in improving residents’ experiences, and to the extent that they identified housing choice and mobility as being part of this experience, they were working or planning to work on initiatives to this end. But as noted above, in most cases agencies did not yet have the data (or in a few instances, had not yet done evaluations) to delineate exactly what was or was not working about their programs. It would be helpful for future analyses to explore at least some of the interim and process outcomes that have resulted from resident choice and mobility initiatives. This would help to identify not only whether agencies are doing *enough* related to resident mobility, but also whether they are taking the *best steps* to have a positive impact on housing choice.

Identification of best practices can follow once agencies have a better understanding of the expected parameters of “housing mobility” and “expanding choice,” and have invested in tracking these outcomes. Much of what agencies had to say about the needs, successes, and challenges of mobility strategies for their particular agencies were rooted in the local structures that MTW flexibility aims to accommodate. This local theme permeated all participant

28 These results are for residents served by the Atlanta Housing Authority’s Quality of Life Initiative which included the relocation of 2,700 households from 12 deteriorating public housing sites. The evaluation also noted positive outcomes for relocated families in terms of employment, crime, and other indicators. The complete report is available at: <http://www.atlantahousing.org/pdfs/FY%202010%20Annual%20Report%20Appendices.pdf>.

interviews. Agencies noted the extent to which local real estate costs (whether high or low) had influenced both resident housing choices and agency development opportunities; agencies' strategies were cognizant of the city layout, employment centers, and transportation infrastructure; agencies noted the influence of city-wide revitalization efforts on targeted housing strategies; and agencies emphasized the role that school selection and job opportunities had on resident choices about where to live and their apparent motivations for moving. Despite such local variations, it is interesting to see that so many of the mobility strategies emphasized by PHAs were so similar. The extent to which these common elements reflect best practices is an area for additional exploration.

Limitations and Next Steps

One of the broad limitations of this type of project is that it is based on a relatively small sample of public housing agencies asked to discuss their own initiatives. Although participants appeared fairly forthcoming in discussing their programs and readily noted both successes and challenges, it is likely that these responses are at least somewhat biased toward exaggerating mobility activities and emphasizing program strengths over limitations. A few steps that may be explored in the short-term and that may help to overcome some of these limitations are as follows:

- To provide a more balanced description of current strategies and their outcomes, conduct additional interviews with non-PHA stakeholders including Resident Advisory Groups and local housing advocacy groups. This will provide additional data and will help to highlight places of agreement/disagreement between PHA and outsider perspectives.
- Conduct interviews with additional PHA staff. Through these preliminary interviews it became clear that - particularly in large PHAs - identifying a single point person who can speak to housing mobility initiatives is often not that simple. There are a myriad of people involved in these efforts who may have slightly different perspectives on this issue.
- Conduct additional outreach to interview the three PHAs that did not participate in this study. This seems particularly critical to do with Atlanta and Chicago given these agencies size, and the potential reach that mobility efforts might have from these agencies' efforts.
- Examine more closely the extent of site and neighborhood standards waivers.

PART TWO: DO CURRENT MTW PLANS INCLUDE MOBILITY PROGRAMMING?

In addition to the qualitative research interviews described in Part 1, in early 2013, we surveyed all current MTW plans to assess the extent to which participating agencies are engaged in or developing mobility initiatives. This research indicates that a significant number of agencies are engaged in mobility efforts. However, there is also much room for improvement, both among current participants and if the program is expanded to additional PHAs in future years.

The mobility initiatives described in current MTW plans are summarized in the accompanying chart. This research identified several categories of mobility programming, which included:

- Modification of the 40% affordability (tenant rent contribution as percentage of income) restriction.
- Sub-market payment standards, in which rent is gauged and may be adjusted to reflect conditions in specific parts of the metro area.
- Offering mobility counseling, which can help residents gain concrete knowledge about lower poverty, high opportunity areas.
- Conducting outreach to landlords and property managers as a means of expanding housing choice.

Additionally, the research noted whether or not each plan specifically addressed mobility, and whether it provided for mobility-related benchmarks or a mobility study. Overall, 21 of the 39 participating agencies addressed mobility programming (falling into one or more of the above categories) in their plans; while 17 (45%) did not.²⁹ Only seven agencies included mobility-related benchmarks or a mobility study. Seven plans provided for rent burden flexibility, modifying the 40% affordability restriction (three of those agencies did not have other identifiable mobility efforts); mobility outcomes will need to be carefully assessed for those programs, in particular, to ensure they are serving tenants and in fact functioning as mobility programs (rather than simply shifting the rent burden from the agencies). As detailed in the chart, a number of agencies are engaged in positive efforts, including counseling, exception payment standards, and landlord outreach. Clear outcome measures should be applied to these programs as well, so that successful initiatives can be identified and expanded to other PHAs, including the substantial number who lack any mobility programming.

29 Note that San Jose and Santa Clara are jointly operated MTW agencies and submit a single plan.

This research included the four new program participants including in 2012. The 2012 MTW Notice of Funding Availability required that each successful applicant “test two priority policy initiatives”: first, a rent reform controlled study designed to advance any one of the MTW statutory goals; and second, the option of either a choice-mobility demonstration or a block grant evaluation. The Choice Mobility Demonstration was defined as follows:

Housing Choice Mobility Demonstration: To further the third statutory objective of the MTW demonstration, increasing housing choice, applicants will design and test an activity that uses MTW flexibility to increase housing choices for residents through mobility programs. An increase in housing choice is defined as providing more types and locations for assisted housing in areas where affordable housing may not be many, and may entail geographic mobility programs that result in residents moving to more racially or economically diverse neighborhoods. The study may encompass public housing, vouchers, or both and may be a subset. The study does not need to encompass the PHA’s entire public housing and/or HCV portfolio, but if a subset of the portfolio is used, HUD requires that the PHA establish statistically valid treatment and control groups that will enable a rigorous evaluation of the activity’s outcomes.³⁰

The choice-mobility demonstration option provided MTW participants with the program’s first explicit choice-mobility guidance, though it was only one option presented to this round of participants. Two of the four new agencies selected the choice-mobility option. This included Columbus, which plans to set aside Housing Choice and Project-Based vouchers for use in low-poverty areas, at a 120% payment standard; and Reno, where the agency will acquire 50 foreclosed properties in areas with poverty rates lower than 10% and make them available to families with children living in public housing with a Project-Based voucher. The two other agencies selected in 2012, Fairfax County and Holyoke, did not select the choice mobility demonstration. As noted in our recommendations, we urge HUD to more strongly incentivize or require a choice-mobility initiative on the part of every participating PHA. This includes the ongoing “rigorous evaluation” of outcomes. Additionally, while the 2012 language is helpful in defining choice to entail integrative moves, it could be more clearly (and less equivocally) phrased.

30 HUD Notice PIH-2012-16, “Request for Applications under the Moving to Work Demonstration Program for Fiscal Year 2011,” February 27, 2012, at 5.

Moving to Work 2013: Mobility Initiatives Identified in Current MTW Plans

Housing Authority	Plan Specifically Addresses Mobility-Related Program(s)	Plan Modifies 40% Affordability Restriction to Promote Mobility	Sub-Market Payment Standards	Offers Mobility Counseling	Conducts Outreach to Landlords and Property Managers to Expand Housing Choice	Mobility-Related Benchmarks or Mobility Study	Plan Does not Specifically Address Mobility
Alaska							X
Atlanta	X		X	X	X	X	
Notes:	Provides a "Leasing Incentive Fee" to encourage landlords and property managers in lower-poverty areas to lease to low-income families impacted by relocation.						
Baltimore	X		X	X			
Boulder	X	X				X	
Notes:	Planning for resident mobility program to test mobility of residents moving from project-based development with HCV using 3 mobility options: none, full, and conditional. (Specifics not clear in plan).						
Cambridge	X	X	X				
Champaign County	X		X				
Charlotte	X				X	X	
Notes:	Agency created the Participant & Landlord Tracking Program, in which it mapped locations of voucher holders, identifying areas of low-poverty and low voucher concentration, and conducted landlord outreach in those areas to increase awareness of benefits of renting to HCV families. Agency began including information in voucher briefings on benefits of living in low-poverty areas. A benchmark was created to reduce % of vouchers within 8 concentrated zip codes from 75% to 71% (actual % during 2nd quarter of FY13 = 81%). Additionally, the agency commissioned "Affordable Housing Impact Studies" to examine the pattern and density of affordable housing and evaluate the association between the housing stock and crime rate, housing and property values, and school equity in surrounding residential communities, in order to give participants access to data about housing location and neighborhood quality that will enable them to choose the neighborhoods that best meet their needs.						
Chicago	X		X	X			
Notes:	Agency can approved exception payment standards up to 300% of established payment standard to expand opportunities in neighborhoods with low poverty, quality schools, transportation access, and community amenities. Agency also offers mobility counseling as a part of its regular (non-MTW) HCV program to educate families on the benefits of moving to Opportunity areas (defined as having less than 23% poverty rate and less than 30% of resident households being African American) or Low Poverty areas (defined as having less than 16% poverty rate). Mobility services include: 1) Community Tours in Opportunity and Low Poverty areas; 2) Unit Search Assistance in Opportunity and Low Poverty areas; 3) workshops such as landlord/tenant rights and responsibilities, financial management, & home maintenance; and 4) up to \$500 incentive toward security deposit, furniture voucher, or driver's license training if a family moves into an Opportunity or Low Poverty area.						

Moving to Work 2013: Mobility Initiatives Identified in Current MTW Plans (continued)

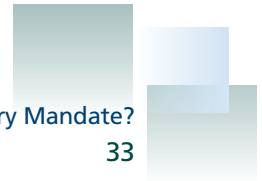
Housing Authority	Plan		Plan			Conducts Outreach to Landlords and			Plan Does not Specifically Address Mobility
	Specifically Addresses Mobility-Related Program(s)	Modifies 40% Affordability Restriction to Promote Mobility	Sub-Market Payment Standards	Offers Mobility Counseling	Property Managers to Expand Housing Choice	Mobility-Related Benchmarks or Mobility Study			
Massachusetts	X				X				
<p>Notes: Agency created an "Owner Incentive Fund" which can be used to increase the number of units leased in currently underserved neighborhoods, encourage new owners to participate, and to housing stock, encourage new owners to participate, and to promote upgrades to housing stock. Owners are eligible for the incentive fee for unit if the owner had not previously been part of HCV program, the unit hadn't been under contract to an HCV participant, unit was new construction or substantial rehab, or unit had been foreclosed property. Additionally, the agency has proposed a Opportunity Neighborhood Initiative to provide support to participants moving to neighborhoods with empirically-documented improved educational systems, job opportunities, social services & other opportunities. Participants will be provided with case management before and after move and may be offered incentives such as transportation assistance and training stipends. Participants will be encouraged to develop "family plan of access to opportunity" focusing on educational and vocational outcomes. The Agency will identify one or more Opportunity Neighborhoods in different regions and is currently working on the research and developing policies for a pilot mobility program. Metrics used to evaluate the initiative will include # of households moving to Opportunity Areas, increases in income, and increases in educational attainment.</p>									
Minneapolis	X			X		X			
<p>Notes: Agency established the HCV Mobility Voucher Program, which targets families living in areas of concentrated poverty who are willing to move to non-concentrated areas and provides incentives including moving allowance up to \$1,000, higher intensity housing search assistance, rigorous education and recruitment of landlords in targeted low poverty neighborhoods, and priority for placement in FSS and homeownership programs.</p>									
New Haven	X				X				
<p>Notes: Agency allows exception payment standards in neighborhoods with low concentrations of poverty and in mixed-income housing.</p>									
Oakland	X					X			
<p>Notes: Agency provides families impacted by public housing disposition with counseling and relocation assistance. The agency has also proposed a standardized transfer policy for public housing residents to get a HCV to move out of concentrated poverty. This strategy has not yet been implemented.</p>									
Orlando									X
Philadelphia									X
<p>Note: program under development</p>									
Pittsburgh	X								
<p>Notes: Agency uses the 40% affordability rule for the tenant rent portion as a guideline rather than as a requirement in order to "increase housing choice for participating families by giving them the option to take on additional rent burden for units in more costly neighborhoods. Agency continues to counsel participants on dangers of becoming overly rent burdened. The agency is working on establishing a baseline of families living in non-impacted areas prior to the 40% affordability rule change in order to compare with the % of families with new leases in non-impacted neighborhoods.</p>									

Moving to Work 2013: Mobility Initiatives Identified in Current MTW Plans (continued)

Housing Authority	Plan Specifically Addresses		Plan Modifies		Sub-Market Payment Standards		Offers Mobility Counseling		Property Managers to Expand Housing Choice		Mobility-Related Benchmarks or Mobility Study		Plan Does not Specifically Address Mobility	
	Mobility-Related Program(s)	40% Affordability Restriction to Promote Mobility	40% Affordability Restriction to Promote Mobility	Promote Mobility	Payment Standards	Standards	Standards	Standards	Standards	Standards	Standards	Standards	Standards	Standards
Portage														X
<p>Notes: Agency allows up to 50% of the participant's adjusted monthly income to be paid toward rent. The plan states: "It is a feature that permits the Housing Choice Voucher participant to choose housing that may be more costly than otherwise permitted under HUD rules and the US Housing Act of 1937. No family is required to do so, but for those who can and are willing to adjust family expenditures to reflect desires for housing over other wants and needs."</p>														
Portland														X
<p>Notes: Agency to begin offering "mobility counseling" but mostly focused on transportation efficiency.</p>														
Reno	X												X	
<p>Notes: Agency selected for designation as an MTW agency in 2012, having applied under the Housing Choice Mobility Demonstration. The application proposes that the agency will acquire 50 foreclosed properties (single-family homes, duplexes, and condominiums) in areas with poverty rates lower than 10% and make them available to families with children living in public housing with a Project-Based voucher. Outcomes will be compared with those of a control group of families in public housing that would be eligible but choose not to apply. The agency will collect data on the number of households moving to census tracts with low poverty and low crime rates, and also indicated willingness to explore metrics related to health, employment, and schools.</p>														
San Antonio														X
<p>Notes: Agency has established policy that could reduce participants' opportunities for mobility by requiring that residents of Project-Based voucher units stay 2 years instead of 1 year to be eligible for an HCV.</p>														
San Bernadino	X					X							X	
<p>Notes: Agency established sub-market payment standards and set a goal to reduce the concentration of voucher holders in submarkets with high poverty rates. However, the agency also established a policy to limit the number of voluntary moves an HCV participant can make to once every 2 years.</p>														
San Diego	X		X		X									X
<p>Notes: Agency has implemented the Choice Communities Initiative to encourage families to move from high-poverty areas to low-poverty areas (9 zip codes targeted). For participating families, 1) the 40% cap is eliminated; 2) families are given resources, information & guidance ("Moving for Opportunity" counseling), 3) a revolving security deposit loan fund is made available, and 4) payment standards are increased in the target areas. However, the agency has also adopted a policy that requires residents of Project-Based Voucher units to stay 2 years before being eligible for an HCV, which could limit mobility opportunities for some families. Metrics for initiative include: percentage of participants moving from high-poverty to low-poverty areas, utilizing security deposit loan program, and remaining in the unit for at least one year.</p>														

Moving to Work 2013: Mobility Initiatives Identified in Current MTW Plans (continued)

Housing Authority	Plan Specifically Addresses Mobility-Related Program(s)	Plan Modifies		Sub-Market		Offers Mobility Counseling		Conducts Outreach to Landlords and Property Managers to Expand Housing Choice		Mobility-Related Benchmarks or Mobility Study		Plan Does not Specifically Address Mobility
		40% Affordability Restriction to Promote Mobility	X	Payment Standards	Standards	Standards	Standards	Standards	Standards	Standards	Standards	
San Mateo County	X	X										
<p>Notes: Agency permits families to pay more than 40% of adjusted income for rent "to support a family's ability to have greater housing choice, through having access to cities throughout San Mateo County." Additionally, the agency allows residents of public housing that have been converted to Project-Based Voucher units to receive an HCV without having to stay in place for one year.</p>												
Santa Clara County/ San Jose												X
<p>Notes: Agency requires residents of Project-Based Voucher units to stay 2 years before being eligible for an HCV.</p>												
Seattle	X			X		X		X		X		
<p>Notes: Agency's 2013 MTW Plan states that it will work to increase housing choice by: 1) Actively recruit landlords in high opportunity/low poverty areas in the city to expand housing choice for voucher holders; 2) Provide more targeted information to voucher households and those on the waiting list about housing choice and the benefits of living in a high opportunity area, including school outcomes, crime rates, and proximity to jobs, public transit, and services; and 3) Increase individualized housing counseling services to serve more voucher participants and to assist them in making informed decisions about housing selection. The agency may also adopt payment standards in excess of 120% FMR if certain market conditions are met. However, the agency has also developed a policy to deny port-out requests to jurisdictions with higher payment standards than Seattle. The Plan states "We anticipate that limiting port outs to Seattle's payment standard will have minimal impact on housing mobility and choice. Fewer than 7 percent of households that port out to other jurisdictions encounter rents above Seattle's payment standards. We expect that the number of denials that would result from the proposed policy change will not be significant enough to limit housing mobility."</p>												
Tacoma												X
Tulare County												X
Vancouver												X
TOTALS	21	7	12	8	6	7	8	6	7	17		



PART THREE: RECOMMENDATIONS

As discussed above, the MTW program has significant potential to expand residential options, lift up effective local innovations, and connect families to opportunity. However, our initial study indicates that despite some success stories, many PHAs would benefit from clearer guidance around how to advance those goals.

Recommendations:

Clarify what it means to “increase housing choices.”

Clarity about what it means to “increase housing choices” is a prerequisite to HUD’s evaluation of the MTW demonstration with regard to this statutory goal, and is needed to guide agencies toward implementing policies that advance it. The study described in Part 1 illustrates that there may be a significant degree of confusion and inconsistency among PHAs on this point. As GAO has also recommended, HUD should more fully define its expectations about what it means to “increase housing choice,” and HUD and PHAs should assess program outcomes accordingly. In addressing this statutory goal, HUD’s MTW guidance should emphasize mobility strategies, and make clear that policies characterized as “increasing housing choice” should not simply reinforce existing, segregative options, but instead should “affirmatively further fair housing.”

The definition embedded in the 2012 NOFA takes a first step in this direction by stating that “an increase in housing choice is defined as providing more types and locations for assisted housing in areas where affordable housing may not be many, and may entail geographic mobility programs that result in residents moving to more racially or economically diverse neighborhoods.” However, this language should be drafted less equivocally, extended to all program participants, and accompanied by detailed guidance addressing best practices and outcome metrics.

Identify and replicate successful practices.

Accurate MTW program assessments are needed to help HUD and agencies identify successful practices that advance housing choice. HUD guidance should emphasize mobility outcomes as an important feature of such assessments. This requires that agencies more rigorously and consistently track and analyze data on mobility. Practices that are shown to be successful in expanding choice can then be expanded and lifted up as “best practices,” serve as models for other PHAs, and be fostered by targeted support from HUD.

Reward choice-mobility performance.

This study indicated that many PHAs did not prioritize mobility initiatives, and struggled to identify funding they could devote to mobility efforts. We recommend that PHAs assess their priorities and ensure that other initiatives are balanced by strong mobility programming. HUD should require all participating agencies to implement strategies to increase housing choice – as more clearly defined to advance fair housing goals – and evaluate their performance accordingly. We also recommend that HUD consider conditioning future MTW extensions on PHA performance in expanding housing choices.

Adhere to civil rights requirements.

While further research will be needed as to the extent to which site and neighborhood standards are being waived, any waivers of this civil rights regulation are troubling. HUD should revise its guidance to make clear that MTW participation does not authorize site and neighborhood standard waivers. These standards embody fair housing requirements and are needed to counter longstanding patterns of segregation.

Provide mobility training to all PHA staff and basic mobility counseling to all residents.

Agencies that cited “participant resistance” as a bar to mobility efforts are likely unaware of the success of, and demand for, mobility programs in other jurisdictions; or of the richly documented educational, health, and other benefits of such programs. Anecdotes of resistance lead some PHAs to overlook the many families who do want to move. Additionally, some of this perceived resistance may reflect a lack of information or past struggles that can in fact be addressed through quality mobility strategies, including counseling and fair housing enforcement. We recommend that HUD convey (and agencies seek out) information regarding mobility successes and benefits so that PHAs are able to make fully informed programming decisions. Outmoded landlord lists that provide only segregated choices should be eliminated. PHA staff should be trained to provide all agency clients with basic, concrete information about the full range of housing choices – including the benefits and practical logistics of moving to a safer neighborhood with higher performing schools. Housing mobility related information should be available to all staff, and should be provided at every stage of the PHA’s interaction with its clients.

Appendices available on the PRRAC website:

Appendix A: Interview Protocol

Appendix B: Detailed Listing of Participating MTW Agencies Goals, Capacity, and Status

www.prrac.org/projects/MTW-HousingOpportunity.php