

PRRAC

Poverty & Race Research Action Council

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October 2, 2009

Dr. Raphael Bostic
Assistant Secretary for Policy Development and Research
U.S. Department of Housing & Urban Development
451 7th Street S.W.
Washington, DC 20410

Re: *Civil Rights Research at HUD*

Dear Assistant Secretary Bostic,

We are writing with some preliminary thoughts on a renewed civil rights and fair housing research agenda for the Department. This letter comes out of a June, 2009 meeting of advocates and researchers at the Urban Institute, co-sponsored by PRRAC, which assessed the prospects for progress in “affirmatively furthering fair housing” across HUD program areas. We recently met with key stakeholders in that meeting to refine our initial research agenda, and to determine which research initiatives would be most appropriate to recommend to your office.¹

Our recommendations are prompted by the insight that HUD programs, in many cases, have continued to perpetuate conditions of racial and economic segregation, and that HUD programs also have the potential to deconcentrate poverty and help create stable, integrated communities. We believe that, pursuant to the Department’s “affirmatively furthering” mandate, PD&R has an important role to play in helping the Department assess its contribution to segregation, and to develop new tools to promote racial and economic integration in metropolitan regions. Our key recommendations follow below.

Current data on racial and economic concentration of project-based housing: The most recent geographic data on HUD project based housing programs is from 2000. In order to conduct an up to date assessment of segregation trends in all HUD programs (and the LIHTC), current location of all housing units by census tract should be made publicly available. When the 2010 census results are available, this data needs to be overlaid with new race and poverty data on the tract level, and compared to the 2000 results.

¹ The recommendations in this letter include contributions from a wide range of participants at the conference; we are particularly grateful for suggestions provided by Mary Cunningham, Jill Khadduri, Danilo Pelletiere, Margery Austin Turner, Henry Korman, Demetria McCain, Barbara Samuels, Adam Gordon, Rosalind Kotz, and Florence Roisman.

Current data on racial and economic concentration of tenant-based housing vouchers: We recommend that the Department undertake a comprehensive update of the 2003 voucher location study, to determine trends in geographic concentration of voucher families. If possible, this data should also be analyzed for racial/ethnic patterns. See Deborah J. Devine et. al, *Housing Choice Voucher Location Patterns: Implications for Participants and Neighborhood Welfare* (Washington, DC: January 2003),

Voucher access in LIHTC and HUD assisted developments in high opportunity areas: A project-by project analysis is needed of the prevalence of portable Section 8 vouchers in federally assisted developments in low poverty and non-racially concentrated areas, to assess the extent of voucher discrimination in such projects. This would include a data match between the LIHTC database and the housing voucher program database that could assist in measuring the degree of access for voucher holders in LIHTC developments in different communities, including an analysis of the race and ethnicity of voucher users in LIHTC developments in different types of neighborhoods. In general, we recommend a stronger research relationship between HUD and the Treasury Department to support an analysis of racial and economic concentration in the Low Income Housing Tax Credit program.

Cross-development racial segregation within metropolitan areas: There is some evidence that housing developments in various HUD programs are not racially integrated within metro areas (for example, the racial makeup of family developments in low poverty suburban towns may be markedly different from in-city developments within the same housing program). Such variance may result from discrimination, residency preferences, failure to affirmatively market units, or personal choice – but it needs to be measured and understood.

Development of a segregation measurement system and periodic civil rights “report cards” to assess progress: We frequently hear the question, “are HUD programs becoming more integrated or more segregated?” This question relates to both the geographic racial and economic concentration of housing location by tract (as referenced earlier) and to the racial/ethnic occupancy across developments within a program. If HUD can develop more current data on these questions, it should be fairly simple to develop an assessment tool that could be updated semi-annually. We would be happy to assist in the development of such a system.

Development of a housing-school database: In light of renewed policy interest in linking school and housing policy, and strong continuing research on the educational harms associated with high poverty schools, we recommend that the Department develop a GIS system that can be used to map elementary school location and current year school characteristics (FARM data, racial/ethnic composition, performance results under NCLB or similar school performance standards) in relation to locations of federally assisted low income housing units.² This database can be used both to assess impacts of current

² If school attendance zone data is difficult to access nationally, we would suggest a simple proxy using a radius around the elementary school address, adjusted for population density.

housing location on education, but would also be useful in guiding housing location decisions department-wide.

HOPE VI review: To our knowledge, there has not been a comprehensive assessment of the location of replacement housing developed under the HOPE VI program to date, and there has not been a comprehensive assessment of the location of relocated former residents. Both of these data would be of enormous help in guiding current policy debates. Similarly, an evaluation should be built into the new “Choice Neighborhoods” initiative to assess the extent to which the program is giving low income, minority families an opportunity to live outside racially concentrated neighborhoods.

Prioritizing housing preservation resources in high opportunity areas: As part of the ongoing efforts to fully inventory “expiring use” and other federally assisted housing at risk of loss, we urge PD&R to develop a priority list of at-risk family housing in low poverty, non-racially concentrated areas. To the extent that housing preservation resources are limited, such a list would assist the Department in affirmatively furthering fair housing in its preservation activities.

Thank you for the opportunity to present these ideas. We would also be interested to meet in person to further discuss these proposals.

Sincerely,

A handwritten signature in black ink, appearing to read 'Philip Tegeler', written in a cursive style.

Philip Tegeler
Executive Director