

## CF – Quality of Affordable Housing Information

*Problems with the quality of affordable housing information can occur when:*

- Households, particularly those with Housing Choice Vouchers, are not provided with information about the features and benefits of low-poverty or high-opportunity areas.
- Households, particularly those with Housing Choice Vouchers, have difficulty accessing information about specific rental opportunities in low-poverty or high-opportunity areas.
- Landlords and property managers fail to effectively market units to households outside their immediate neighborhoods.
- Public housing agencies and other entities fail to educate landlords and property managers on fair housing laws and the benefits of mobility programs.

*Examples of fair housing issues and strategies to address them:*

Segregation and R/ECAPs	Disproportionate Housing Needs	Disparities in Access to Opportunity	Publicly Supported Housing Location & Occupancy
Households lack knowledge of neighborhoods and rental opportunities outside of R/ECAPs, so have difficulty moving beyond their immediate neighborhoods, perpetuating segregation.	Households with Housing Choice Vouchers, who may be disproportionately members of protected classes, have lower access to quality housing in areas of opportunity because landlords in those areas rarely rent to such households.	Households in low-opportunity areas lack information about neighborhoods and rental opportunities with access to high-opportunity characteristics, so are unlikely to move to such areas.	Properties fail to actively market to households throughout the region, so that occupancy reflects segregated patterns.
Strategies			
<p><b>Create procedures to provide up-to date, comprehensive information about rental opportunities throughout the region.</b></p> <p><b>For example:</b></p> <ul style="list-style-type: none"> <li>• Ensure that apartment listings include current listings of affordable units outside areas of poverty or minority concentration.</li> <li>• Provide mobility counseling.</li> </ul>	<p><b>Engage housing providers throughout the region.</b></p> <p><b>For example:</b></p> <ul style="list-style-type: none"> <li>• Target efforts to identified opportunity areas to conduct landlord outreach and provide information on the benefits of participating in the HCV program.</li> <li>• Connect mobility counseling clients with landlords in high-opportunity, high-quality housing.</li> </ul>	<p><b>Create procedures to provide up-to date, comprehensive information about opportunity areas and available rentals in those areas.</b></p> <p><b>For example:</b></p> <ul style="list-style-type: none"> <li>• Develop briefings on the value of living in lower poverty areas and the resources available in such areas.</li> <li>• Provide Housing Choice Voucher families with listings of available units located in opportunity areas; systematically maintain and update these listings.</li> </ul>	<p><b>Consider requirements or incentives for affirmative marketing by housing providers.</b></p> <p><b>For example:</b></p> <ul style="list-style-type: none"> <li>• Enact affirmative fair housing marketing requirements for publicly-supported housing, requiring targeted outreach to community groups and media throughout a region.</li> <li>• Formulate and incentive use of “best practices” in affirmative marketing.</li> </ul>

# Quality of Affordable Housing Information

## Introduction

Families seeking information on affordable housing options may have limited resources and have a difficult time locating information on the full range of rental housing available to them throughout their regions. Low income families, in particular, may face urgent pressure to find housing within a short time, and become reliant on word-of-mouth referrals or landlords who expressly market to them.<sup>1</sup> Families and individuals with Housing Choice Vouchers (HCVs) are especially vulnerable to lack of information regarding neighborhoods and available rentals outside their immediate neighborhoods, and to reliance on rental information that is tailored to lower-opportunity neighborhoods.<sup>2</sup> These inadequacies in the quality of affordable housing information may impede or inhibit residents from finding homes that are outside of R/ECAPs, offer greater access to opportunity, or otherwise reflect full and open housing choice—even when the regional housing market provides for such options.

This section describes the ways in which affordable housing information is provided and how the quality of those programs can contribute to fair housing issues. These programs include:

- Rental listings
- Mobility counseling
- Voucher briefings
- Landlord outreach
- Affirmative marketing

This section also offers strategies through which those defects may be addressed, and affordable housing information programs may be used to further fair housing.

## A. What are Affordable Housing Information Programs?

The term “quality of affordable housing information” refers to programs that provide prospective tenants with knowledge about neighborhoods and rental opportunities throughout a region. High-quality programs will connect tenants with specific rental prospects (including options outside of segregated or lower-opportunity areas); convey information on neighborhood characteristics; and may potentially include components of logistical and financial counseling. Affordable housing information programs also include education and outreach for landlords and property managers, in order to broaden the opportunities available to prospective tenants, including voucher holders. Such programs can enable housing choice and help community residents overcome exclusionary or segregative housing patterns, which may be perpetuated by rifts in knowledge.<sup>3</sup>

As noted in the AFFH Rule Guidebook, for any type of affordable housing information program, it will be important to consider the extent to which the information: is comprehensive (e.g.,

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<sup>1</sup> See DeLuca, Stefanie, Philip Garboden and Peter Rosenblatt. 2013. “Segregating Shelter: How Housing Policies Shape the Residential Locations of Low Income Minority Families.” *Annals of the American Academy of Political and Social Science* 647:268-299; Garboden, Philip M.E. and Stefanie DeLuca. 2014. See generally Matthew Desmond, *Evicted* (New York: Crown, 2016).

<sup>2</sup> DeLuca, Stefanie, Philip Garboden and Peter Rosenblatt. 2012. “Why Don’t Vouchers Do a Better Job of Deconcentrating Poverty? Insights from Fieldwork with Poor Families.” *Poverty and Race* 21: 1.

<sup>3</sup> See Krysan, Maria and Michael Bader, Racial Blind Spots: Black-White-Latino Differences in Community Knowledge, *Social Problems*, Vol. 56, Issue 4, pp. 677-701 (2009).

whether it includes a variety of neighborhoods and conveys information regarding opportunity characteristics); is up-to-date (e.g., that the publicly supported housing entity is taking active steps to maintain and improve the information); and entails pro-active outreach (e.g., to widen the pool of participating housing providers). Whether there is a system in place to effectively and broadly distribute the information (e.g., through community outreach to potential beneficiaries) is also important.

Types of affordable housing information programs, and some of the issues that may arise with their quality, are described below.

### *1. Rental listings*

Housing Choice Voucher households are largely reliant on available rental listings provided by public housing agencies (PHAs) in either electronic or paper form, or on websites that specifically cater to voucher holders.<sup>4</sup> The quality and scope of these rental listings can have a major impact on segregation, disproportionate housing needs, and access to opportunity. If lists of apartments provided to families are limited to (or disproportionately skew toward) lower-opportunity, higher-poverty neighborhoods, families will tend to locate in those areas. This can occur with online listings as well as traditional paper listings.<sup>5</sup> Public housing agencies (PHAs) are now required to provide families with listings of landlords or apartments outside of areas of poverty or minority concentration.<sup>6</sup> However, these lists may not adequately include geographically diverse listings or may not be regularly updated.

Broader use of listings may include instruction in how to use nationally available on-line listings like Craigslist and Zillow, realtors' websites and the many search engines now available to renters.<sup>7</sup> Voucher holders may also be informed that many real estate brokers list rental properties. These are all search tools that are used by voucher holders in mobility programs to find housing in the mainstream market, but that are infrequently used by regular voucher holders in high poverty areas.

### *2. Mobility counseling*

“Housing mobility counseling” refers to programs that help low-income households—usually households with Housing Choice Vouchers—move to low-poverty and high-opportunity areas. Mobility counseling ensures that families are fully aware of their choices and have access to quality housing in areas with good schools, safe neighborhoods, greater economic opportunities, and a healthier environment. Comprehensive housing mobility counseling programs include both pre- and post-move counseling, as well as landlord outreach, and housing search assistance.<sup>8</sup> Pre-move counseling typically starts before the household receives a voucher and can last up to

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<sup>4</sup> *Constraining Choice: The Role of Online Apartment Listing Services in the Housing Choice Voucher Program* (PRRAC, July 2015), available at [www.prrac.org/pdf/ConstrainingChoice.pdf](http://www.prrac.org/pdf/ConstrainingChoice.pdf).

<sup>5</sup> *Id.*, *Constraining Choice: The Role of Online Apartment Listing Services in the Housing Choice Voucher Program* (PRRAC, July 2015), available at [www.prrac.org/pdf/ConstrainingChoice.pdf](http://www.prrac.org/pdf/ConstrainingChoice.pdf).

<sup>6</sup> Final Rule, “Housing Choice Voucher Program: Streamlining the Portability Process,” 80 Fed. Reg. 50564 (August 20, 2015); amended by 80 Fed. Reg. 52619 (September 1, 2015); further explicated by HUD Notice PIH 2016-09 (June 6, 2016).

<sup>7</sup> See, e.g. <http://www.placeofmine.com/>

<sup>8</sup> *Expanding Choice: Practical Strategies for Building a Successful Housing Mobility Program* (Urban Institute and PRRAC, February 2013), available at [www.urban.org/sites/default/files/alfresco/publication-pdfs/412745-Expanding-Choice-Practical-Strategies-for-Building-a-Successful-Housing-Mobility-Program.PDF](http://www.urban.org/sites/default/files/alfresco/publication-pdfs/412745-Expanding-Choice-Practical-Strategies-for-Building-a-Successful-Housing-Mobility-Program.PDF).

thirteen or more months depending on the household's needs. Pre-move counseling may include workshops covering topics such as credit counseling, financial literacy, budgeting, tenants' rights and responsibilities, housekeeping and maintenance, and fair housing laws. Helpful services offered during the pre-move counseling phase include the creation of individual family plans, negotiations with landlords, housing search community tours, education and childcare research, referrals to training and employment options, and expedited inspection processes.

Post-move counseling helps to ensure the household is adjusting well in its new neighborhood, and helps families with children successfully remain in their new communities and schools. Post-move counseling may include following up with the family within 30-60 days after their move, then again between 90-120 days, at six months, and at nine months to see whether the family is planning to stay and to help with lease renewal or provide assistance with a housing search if the family wants to move. Post-move counseling may also include linking the family to community organizations for support in their new community.<sup>9</sup>

### *3. Voucher briefings*

Voucher briefings, administered in person by staff at the public housing agency, occur when a household first receives a Housing Choice Voucher and again upon annual recertification. These briefings can provide basic oral and written information on the HCV program, including information on available housing options across a range of neighborhoods. Under HUD rules adopted in 2015, every initial voucher briefing must also include an explanation of the advantages of moving to areas with low concentrations of low income households, listings of landlords or apartments that include locations outside of areas of poverty or minority concentration, and information on portability (how to use a voucher across jurisdictional lines).<sup>10</sup> However, the depth of this information, and whether it is consistently provided, may vary, leaving voucher holders without reliable access to this information.

### *4. Landlord outreach*

In order for voucher households to have a full range of choices and access to housing in opportunity areas, HCV programs will have to help identify potential units outside of neighborhoods where such housing is concentrated or where supported or affordable housing has traditionally been most easily available. An initial step is to identify rental properties that receive HUD assistance in high opportunity areas—these may be project-based voucher units, low income housing tax credit units, or landlords already working with the voucher program—and connect them with prospective tenants.<sup>11</sup> An important feature of landlord outreach is educating a broad array of landlords and property managers on fair housing laws (including state and local protections, which may be broader than federal laws) and on the benefits of participating in mobility programs, such as direct deposit of the rental payment, fast tracked inspections, and landlord/tenant mediation.

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<sup>9</sup> Id.

<sup>10</sup> Final Rule, "Housing Choice Voucher Program: Streamlining the Portability Process," 80 Fed. Reg. 50564 (August 20, 2015); amended by 80 Fed. Reg. 52619 (September 1, 2015); further explicated by HUD Notice PIH 2016-09 (June 6, 2016).

<sup>11</sup> *Expanding Choice: Practical Strategies for Building a Successful Housing Mobility Program* (Urban Institute and PRRAC, February 2013), available at [www.urban.org/sites/default/files/alfresco/publication-pdfs/412745-Expanding-Choice-Practical-Strategies-for-Building-a-Successful-Housing-Mobility-Program.PDF](http://www.urban.org/sites/default/files/alfresco/publication-pdfs/412745-Expanding-Choice-Practical-Strategies-for-Building-a-Successful-Housing-Mobility-Program.PDF).

## 5. Affirmative marketing

Even when housing options are available in higher-opportunity or non-R/ECAP areas, prospective tenants may be unaware that such opportunities exist beyond their existing neighborhoods; or may feel unwelcome due to a lack of outreach combined with a history of exclusion. Affirmative marketing programs overcome these informational gaps by marketing housing to tenants who otherwise are relatively unlikely to apply due to segregation. To be effective, such marketing has the following characteristics: has a broad geographic scope (reaching prospective tenants beyond the immediate neighborhood); targets multiple, effective outlets, such as minority media and community groups (including through languages other than English); facilitates the housing application process by providing sufficient lead time and detail, such as income requirements and applicable non-discrimination and reasonable accommodations law (including state or local laws, which may offer broader protections than federal law); and, for greatest fair housing value, is information-rich (providing detail on community characteristics such as transportation, park space, and services).<sup>12</sup>

HUD regulations require affirmative fair housing marketing (AFHM) plans for a number of federally-supported housing programs, such as Section 8 Project-Based assistance, Federal Housing Administration programs, and HOME.<sup>13</sup> State or local legislation may also require affirmative marketing programs, in which case the more rigorous standard is the one that applies;<sup>14</sup> this legislation may also provide that affirmative marketing is required of additional housing programs (such as those supported by the state).<sup>15</sup> Additionally, because HUD's AFHM requirements allow for significant discretion by housing managers (for example, in marketing content and definition of the "housing market" that advertising should reach), program participants can play a role in ensuring that AFHM is meaningful and consistent. States or localities also have other ways to require or incentivize affirmative marketing: for example, through Qualified Allocation Plans, which are used to distribute Low Income Housing Tax Credits. Policymakers may also work with trade associations to design and promote voluntary affirmative marketing programs.

### **B. How does the quality of affordable housing information programs contribute to fair housing issues?**

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<sup>12</sup> See, e.g., Megan Haberle, Ebony Gayles, and Philip Tegeler, *Accessing Opportunity: Affirmative Marketing and Tenant Selection in the LIHTC and Other Housing Programs*, PRRAC, December 2012, available at [www.prrac.org/pdf/affirmativemarketing.pdf](http://www.prrac.org/pdf/affirmativemarketing.pdf); *Affirmatively Furthering Fair Housing: A Guide for Housing Providers*, Connecticut Fair Housing Center, 2013, available at: [www.gnofairhousing.org/wp-content/uploads/2013/09/CFHC-AffirmFurthGuideProvidersR2.pdf](http://www.gnofairhousing.org/wp-content/uploads/2013/09/CFHC-AffirmFurthGuideProvidersR2.pdf).

<sup>13</sup> See, e.g., 24 C.F.R. §200.600 (FHA, and incorporated by reference for other programs); 24 C.F.R. § 108 (compliance); 24 C.F.R. §§92.351; 92.504; 92.61 (HOME); 24 C.F.R. § 5.655, 108.25 (Section 8); see also list at [www.prrac.org/pdf/AffirmativeMarketingAppendixA.pdf](http://www.prrac.org/pdf/AffirmativeMarketingAppendixA.pdf) (Appendix to *Accessing Opportunity: Affirmative Marketing and Tenant Selection in the LIHTC and Other Housing Programs*, PRRAC, December 2012); see also HUD's *Implementing Affirmative Fair Housing Marketing Requirements Handbook* (8025.1), available at [https://portal.hud.gov/hudportal/HUD?src=/program\\_offices/administration/hudclips/handbooks/fheo/8025.1](https://portal.hud.gov/hudportal/HUD?src=/program_offices/administration/hudclips/handbooks/fheo/8025.1).

<sup>14</sup> See, e.g., HUD *Occupancy Handbook*, 1-6(D).

<sup>15</sup> See, e.g., Massachusetts Department of Housing and Community Development, *Affirmative Fair Housing Marketing Plan Guidelines*, [www.mass.gov/Ehed/docs/dhcd/hd/fair/afhmp.pdf](http://www.mass.gov/Ehed/docs/dhcd/hd/fair/afhmp.pdf); Connecticut Fair Housing Regulations, §8-33ee-2(a); N.J. Admin. Code § 5:80-26.15.

While high-quality affordable housing information programs can help a community overcome the barriers in knowledge that reinforce segregation and lack of housing choice, low-quality (or a lack of) affordable housing information programs may contribute to fair housing issues. These include:

- Segregation and Racially and Ethnically Concentrated Areas of Poverty (R/ECAPs)
- Disparities in Access to Opportunity
- Disproportionate Housing Needs
- Publicly Supported Housing Location and Occupancy (which may reflect the above fair housing issues, or additional problems of segregation or lack of open housing choice for members of protected classes)

Examples of how these may occur are described below.

### Segregation and R/ECAPs

- Lack of mobility counseling limits choices for HCV households outside of R/ECAPs

Households in segregated areas often lack networks or other sources of information beyond their existing neighborhoods. If HCV households are not provided with quality mobility counseling and shown low-poverty areas when searching for housing, they will be unlikely to move beyond areas that are well-known and immediately accessible. This lack of information can perpetuate segregation and concentrate HCV holders in neighborhoods of high poverty and/or lower opportunity.

- If Housing Choice Voucher families are shown listings of landlords or apartments located predominantly in high-poverty areas, this will tend to guide families' housing choices to these areas, and exacerbate poverty concentration

Public housing agencies that fail to actively generate and update a diverse list of rental opportunities (despite their regulatory obligation to do so) may rely primarily on referrals from landlords affirmatively seeking to rent to housing choice voucher families. Similarly, PHAs that refer families to online listing services focusing on the Section 8 market may be guiding households to a limited cohort of landlords who seek to rent to HCV families.<sup>16</sup> This type of rental listing may tend to create "Section 8 submarkets," often in higher-poverty areas of a jurisdiction or region.

### Disparities in Access to Opportunity

- Housing Choice Voucher briefings that fail to explain the benefits of living in low-poverty neighborhoods, including access to high quality schools, employment, safe neighborhoods, healthy food, parks and recreation programs, may prevent households from gaining access to areas of opportunity.

As noted above, HUD rules adopted in 2015 require every initial voucher briefing to include an explanation of the advantages of moving to areas with low concentrations of low income households, listings of landlords or apartments that include locations outside of areas of poverty

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<sup>16</sup> See *Constraining Choice: The Role of Online Apartment Listing Services in the Housing Choice Voucher Program* (PRRAC, July 2015), available at [www.prrac.org/pdf/ConstrainingChoice.pdf](http://www.prrac.org/pdf/ConstrainingChoice.pdf).

or minority concentration, and information on portability (how to use a voucher across jurisdictional lines).<sup>17</sup> The benefits of living in low-poverty areas include access to higher quality schools, expanded employment opportunities, safer and more environmentally healthy neighborhoods, healthy food choices, and expanded parks and recreation options. A number of these points of comparison can be accessed on the HUD AFFH data tool or through local data and knowledge. The point of briefing families on the advantages of living in low poverty neighborhood is not to denigrate their current community (where they may choose to remain), but rather to empower them with knowledge of their full range of choices, including those to which they have not previously been personally exposed.

- Lack of landlord outreach can deprive HCV households from access to areas of opportunity

Lack of outreach to landlords in high-opportunity areas is likely to impair the ability of households to learn about and access units in those areas. Landlords may be unaware of fair housing laws or of the benefits of participating in mobility programs, or simply may not take the initiative to list their properties with prospective tenants outside their immediate neighborhood. This results in actual or perceived limitations on the rental units available to households that have vouchers or that currently reside in lower-opportunity areas.

#### Disproportionate Housing Needs

- Listings of landlords or apartments located predominantly in high poverty areas limit housing options for households and constrict the available market for low and moderate income households

PHAs that fail to provide current apartment listings in higher-opportunity areas are potentially limiting households' access to the entire rental market in an area, which artificially increases competition for units in the lower-opportunity neighborhoods, driving up prices for older and generally lower quality housing. Housing in higher-poverty areas may also be older, with higher levels of lead, greater exposure to airborne toxins and allergens, and higher rates of disrepair.

#### Publicly-Supported Housing Location and Occupancy

- Due to a lack of quality marketing regarding rental opportunities outside of R/ECAPs, residents rarely move to available housing beyond their original neighborhoods, perpetuating segregated patterns of occupancy

Even where AFHM is required (for example, with Section 8 properties), property managers may not consistently follow the practices needed for such marketing to be effective. For example, there may be failures to market to a sufficient wide "market area" to reach tenants with different demographics than those reflected in the immediate area; failures to target speakers of languages other than English; failures to provide adequate housing search lead times and application details; inadequate information to persuasively market to prospective tenants with little pre-existing information about or networks in an area; or inadequate outreach to media and community groups. Furthermore, local data and knowledge may show that there is a lack of robust affirmative marketing requirements (or incentives) applicable to other publicly-supported housing within a region.

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<sup>17</sup> Final Rule, "Housing Choice Voucher Program: Streamlining the Portability Process," 80 Fed. Reg. 50564 (August 20, 2015); amended by 80 Fed. Reg. 52619 (September 1, 2015); further explicated by HUD Notice PIH 2016-09 (June 6, 2016).

Without the relevant AFHM requirements, incentives, and promotion of best practices, property managers and housing agencies with available rental opportunities will likely fail to actually reach and inform prospective tenants throughout a region. This lack of information regarding housing beyond areas where tenants have an existing network, or in areas that have a history of exclusion, will often tend to perpetuate segregation and raise barriers to actual and meaningful housing choice.

**C. How do you determine if the quality of affordable housing information is contributing to fair housing issues in your community?**

There are various resources available for program participants to use when analyzing whether the quality of affordable housing information programs is contributing to fair housing issues in a particular jurisdiction or region. These resources include HUD-provided data, local data and knowledge, including the community participation process, and information regarding PHA policies and practices. Examples of such resources include the following.

- To assess the presence of potential fair housing issues within the community, it will be helpful to examine demographic data on publicly-supported households and their location in relation to R/ECAPs and neighborhood opportunity characteristics.
- To assess program quality and whether adequate systems are in place to provide quality information, it will be helpful review relevant Public Housing Agency documents. These documents include the Section 8 Administrative Plan, the Section 8 briefing packet, the script used by Section 8 workers for the initial HCV briefing and recertification, and the letters sent out to families in advance of their recertification.
- To assess whether meaningful, consistent affirmatively marketing policies are in place and consistently followed, it will be helpful to consult with relevant agencies, and review state and local laws and policies regarding AFHM. For instance, participants may consult their local HUD offices regarding AFHM plan oversight; review state and local requirements, QAP and other state or local incentives; and solicit input from local housing agencies, trade associations, and fair housing groups with regard to existing AFHM programs and recommended improvements.
- To evaluate how policies are actually carried out within the community, and scope other potential problems and solutions, the community participation process will be especially valuable. This process is a fundamental part of the AFH, and can provide valuable information about program consistency and quality, including how responsive the program is to local needs. Fair housing groups, HCV households and community groups that represent them, and reality or landlord associations may all provide helpful information regarding how effective the current affordable housing information programs are in addressing fair housing issues.

**D. What strategies can be adopted to improve the quality of affordable housing information programs?**

Once program participants determine how the quality of affordable housing information programs may contribute to fair housing issues in the community, they should identify strategies that specifically address those problems or deficiencies and provide for broader housing choice,

including in areas of opportunity.

A number of strategies are provided as examples below, though this is not a comprehensive list and other problems or strategies may be relevant.

Examples of how the quality of affordable housing information programs contribute to fair housing issues	Sample strategies to address fair housing issues
<b>Segregation and R/ECAPs</b>	
Tenants within R/ECAPs lack information about specific rental opportunities outside of R/ECAPs.	Enact strong affirmative fair housing marketing requirements for publicly-supported housing in high opportunity communities, requiring targeted outreach to community groups and media throughout a region.
Families with Housing Choice Vouchers live disproportionately in R/ECAPs due to a lack of knowledge about the features and benefits of low-poverty areas.	Include information about the specific benefits of moving to low poverty areas, including the entire range of community resources available in such areas, as part of the initial HCV briefing, and recertification, for all HCV families; provide landlord and apartment listings with current listings of affordable units outside areas of poverty or minority concentration.
<b>Disparities in Access to Opportunity</b>	
Tenants in low-opportunity areas lack information about specific rental opportunities in high-opportunity areas.	<p>Formulate and incentive use of “best practices” in affirmative marketing that provide information-rich content about opportunity areas; attach affirmative marketing conditions to transit-oriented development in opportunity areas, LIHTC development in opportunity areas, and other funding; establish marketing consortia in which housing agencies/developers in high-opportunity areas pool resources for intensive, quality marketing to low-opportunity residents.</p> <p>PHAs engage in landlord outreach and recruitment to ensure a supply of available apartments in higher opportunity communities.</p> <p>Provide Housing Choice Voucher families with listings of current available units located outside areas of poverty and minority</p>

concentration; maintain and update these listings frequently to ensure they are current.

**Disproportionate Housing Needs**

Landlords with safe, affordable rental units in high-opportunity areas rarely rent to voucher holders or households of protected classes.

Target efforts to identified opportunity areas to conduct landlord outreach and provide landlords with information on the benefits of participating in the HCV program.

**Publicly Supported Housing Location & Occupancy**

HCV tenants may not be aware of their rights to rent in other publicly-supported housing, concentrating those households in segregated areas.

Include lists of Low Income Housing Tax Credit and HOME properties located in lower poverty areas and areas of opportunity; these properties are prohibited under federal law from discriminating against families with Housing Choice Vouchers.