“Affirmatively Furthering Fair Housing” in Older, Diverse Suburbs

In 2008, the National Commission on Fair Housing articulated a vision of “inclusive, diverse communities of choice,” recognizing that the integration goals of the 1968 Fair Housing Act could be realized in a variety of urban, suburban, and rural contexts. The Commission recognized that racial and economic integration in exclusionary high-income suburbs required a different set of tools than the interventions needed in gentrifying city neighborhoods, or in older diverse suburbs already experiencing significant racial and economic transition. These latter communities are highlighted in the new book, Confronting Suburban Poverty (Brookings 2013), and in the article that follows by Myron Orfield, author of Metropolitics, and on page 3 by Alan Berube & Natalie Holmes, co-author of the Brookings book. Older, diverse suburbs present an especially important challenge as HUD moves forward with implementation of its newly announced “Affirmatively Furthering Fair Housing” rule. These communities can present a vibrant snapshot of the diverse America we are becoming, yet they are also communities at risk of disinvestment and resegregation. We hope the dialogue below will further the search for policy tools and best practices to strengthen and preserve these communities as vibrant hubs of diversity, political engagement, and economic opportunity.—the editors

Diverse Suburbs and Civil Rights

Myron Orfield & Thomas Luce

I. The Diverse Suburbs

Diverse suburbs, communities where 20 to 60% of the residents are non-white, represent the largest single suburban segment. Once a destination for whites avoiding city neighborhoods, many of these areas now struggle to maintain racial and economic diversity while competing against newer, whiter and richer suburban communities that are often resistant to affordable housing and racial diversity.

Diverse communities have many strengths. They are growing. Population in suburbs that were diverse in 2010 grew by 15% between 2000 and 2010—more than any other community type except the sparsely settled exurban group. In fact, suburbs that were diverse in 2010 added more population in the previous 10 years (6.8 million people) than predominantly white areas (3.1 million) and exurbs (2.5 million) combined. They also contain more jobs per capita than any of the other groups except central cities, and show the greatest job growth of any group except exurbs (which started with a very small base of jobs). Many suburban job centers—the most important source of job growth in modern American metropolitan areas—are located in diverse suburbs because those diverse suburbs are often located...
near core areas and along interstate highways. Reflecting this, they are largely fully developed—about two-thirds of them are more than 80% urbanized and less than 5% of them are less than 20% urbanized.

Other common measures of social and economic welfare indicate that diverse suburbs are less stressed than central cities and predominantly non-white suburbs but lag behind predominantly white areas. A typical diverse suburb had a local tax base roughly equal to its region’s average in 2008. In this regard, diverse suburbs trailed predominantly white suburbs by several percentage points, but fared far better than the non-white suburbs or the exurbs.

The most troubling signs for diverse communities from a civil rights perspective are the clear indications that many are in the midst of a racial transition in the direction of segregation. Integrated suburbs show the most rapid racial change (relative to their individual metros) of all of the community types. The non-white share of population in a typical diverse suburb increased from 65% of the regional average in 2000 to 78% in 2010.

The diverse suburbs are evenly split between Democrats and Republicans. They are more likely than other types of suburbs to switch parties from one election to another and, as a result, can often decide the balance of state legislatures and the Congress, or determine the outcome of gubernatorial and presidential elections. If the diverse suburbs banded together to form a political faction, it would be hard to deny them.

II. Strategies to Achieve Stably Integrated Suburbs

Racial instability and resegregation are the dominant U.S. pattern. However, stable racial integration has been achieved by neighborhoods, cities, large urban counties and even at metropolitan scales. Stable integration does not happen by accident, but is almost always the product of clear race-conscious strategies, hard work and political collaboration among local governments. Stable integration measures work best when local, state and federal governments and the private sector are cooperating with strong multi-racial citizen involvement.

The following are concrete strategies that can foster residential stability in diverse communities:

A. Civil Rights Enforcement

The most obvious way to promote integrated communities is through enforcement of the national Fair Housing Act, which prohibits racial steering, mortgage-lending discrimination, and disproportionate building of subsidized housing in integrated communities.

Neighborhoods were once zoned by race, racially restrictive covenants kept neighborhoods rigidly segregated, real estate agent rules required racial steering in some areas, and the federal government endorsed the redlining of non-white and integrated neighborhoods. This sort of clear and overt discrimination is gone, and as a result residential integration has improved slowly—however, less obvious and often covert racial discrimination in the housing market remains common.

One of the best ways to document modern housing discrimination is through paired testing. To do this, researchers assemble a large group of paired white and non-white testers of the housing market. Each pair of white and non-white testers has similar incomes, credit histories, education and personal backgrounds. The testers are trained to approach and interact with real estate agents and banks in the exactly the same manner. For example, both the white and non-white tester might ask a real estate agent to show them the best house, in the best neighborhood, with the best schools that they can afford. Illegal discrimination occurs when these paired testers are shown neighborhoods with different racial characteristics, receive different credit treatment, or are treated differently by sellers or rental agents. Without such paired testing, it is hard to detect, much less prove, such discrimination.

HUD, the federal agency charged with enforcing the Fair Housing Act, is now conducting metropolitan-level, paired-testing steering studies to make sure that all parts of suburbia are open to non-white buyers, to ensure that non-white buyers are not disproportionately steered toward racially diverse neighborhoods and school-attendance areas, and to confirm that white buyers are not steered away from these same areas to white neighborhoods. If and when evidence is found of steering or other housing discrimination, HUD and appropriate local authorities should take enforcement actions to ensure that such discrimination stops.

The government has been collecting mortgage data through the Home Mortgage Disclosure Act for 40 years. It has revealed profound disparities in the treatment of white and non-white individuals and among predominantly white, predominantly non-white, and integrated neighborhoods. The data suggest discrimination under the Fair Housing Act, and federal, state and

(Please turn to page 10)
Affirmatively Furthering Fair Housing: Considerations for the New Geography of Poverty

Alan Berube & Natalie Holmes

Since 1968, the Fair Housing Act (Title VIII of the Civil Rights Act) has prohibited housing discrimination on the basis of race and has sought to address a legacy of racial segregation and housing inequities in the United States by affirmatively promoting integration and investment in housing. To date, the Department of Housing and Urban Development (HUD) has fulfilled this obligation by requiring its grantees to complete an Analysis of Impediments to Integration (AIs), which documents restrictive zoning laws and other local barriers to fair housing.

Given widespread acknowledgment that AIs fall short of their statutory obligation to affirmatively further fair housing (AFFH), in July of this year, HUD issued a Proposed Rule that would clarify and amend the AI process for Community Development Block Grants, HOME Investment Partnerships, Emergency Solutions Grants, Housing Opportunities for Persons with AIDS, and Public Housing Agencies. The Proposed Rule represents a renewed effort to implement the Fair Housing Act’s mandate to address the persistence of racially concentrated poverty in the United States.

One complicating factor is that the geographies of race and poverty have changed considerably since the Fair Housing Act became law 45 years ago. The country overall is much more racially and ethnically diverse, and poverty in metro areas has shifted well beyond its historical confines in inner-city neighborhoods. Given these significant contextual changes, how will HUD’s Proposed Rule affect its dual mandates to prevent discrimination and promote integration?

The AFFH Proposed Rule comes at a critical juncture in the evolution of U.S. regions. Between 2000 and 2010, racial and ethnic minorities accounted for 92 percent of total U.S. population growth. White Americans still comprise the majority of the overall population, but their share has fallen significantly in recent decades.

Moreover, although whites make up 63 percent of total population, they represent just 41 percent of people in poverty. In 2012, African Americans made up 13 percent of total population and their poverty rate was 27 percent, compared to 15 percent for the total population. The poverty rate among Hispanic Americans, who comprise nearly 17 percent of the population, was 26 percent. Relative to their share of the total population, racial and ethnic minorities remain disproportionately poor.

The location of racial and ethnic minorities in metro areas, including those below the poverty line, has changed markedly in the last couple of decades. Recent Brookings analysis indicates that in the nation’s major metropolitan areas, for the first time, a majority of all racial/ethnic groups, and a majority of all poor individuals, live in the suburbs. These two changes—but especially the latter—bear directly on the Proposed Rule’s implementation.

During the 2000s, the number of poor people in major metropolitan suburbs surpassed the number in cities. Between 2000 and 2011, the poor population in suburbs grew by 64 percent—more than twice the rate of growth in cities (29 percent). By 2011, almost 16.4 million residents in suburbia lived below the poverty line, outstripping the poor population in cities by almost 3 million people. Over the same period, poverty rates rose by nearly equal degrees in cities and suburbs (more than 3.5 percentage points). To be sure, the urban poverty rate remained almost 10 percentage points higher than the suburban rate on average (22 percent versus 12 percent, respectively). But the 55 percent of poor individuals in metro areas today who live in suburban communities represents a considerable shift from the minority of poor metropolitan individuals who lived in suburbs just a decade ago.

What is more, low-income suburban residents and communities today spread well beyond the inner-suburban jurisdictions, particularly in the Northeast and Midwest, whose struggles Myron Orfield and others began to chronicle in the 1990s. Especially in the wake of the home-building boom and bust of the 2000s, a large number of poor individuals and neighborhoods can be found in the mature and outer suburbs of the nation’s Sun Belt metro areas.

And while many of the suburban poor enjoy more access to higher-quality communities than their inner-city counterparts, others face obstacles to economic stability and success.

The geographies of race and poverty have changed considerably since the Fair Housing Act became law 45 years ago.
include: limited access to nearby transit; sparse and financially tenuous safety net services; a lack of philanthropic resources to support anti-poverty efforts; new stresses on schools under-equipped to respond to rapid demographic and economic changes among their student populations; and local perceptions about the magnitude or source of these new challenges that are out of step with reality.

Although anti-poverty policies and programs have proliferated in the decades since the War on Poverty, none of these types of programs was built with suburbs in mind. Poverty in suburbs tends to spread over larger areas that are a poor fit for neighborhood improvement programs, which often fail to encourage collaboration among fragmented suburban jurisdictions. Service delivery programs are also a poor match for dispersed suburban poverty, especially in small, resource-strapped municipalities. And many lower-income suburbs include residents who took advantage of programs to expand residential opportunity, but who now find themselves further isolated from social and economic opportunity. Finally, these approaches fail to confront the lack of capacity, fragmentation, and inefficient and inflexible funding sources that often characterize suburbia.

As HUD weighs public feedback on its Proposed Rule—over 1,000 comments in all—it is clear that how fair housing programs are implemented matters significantly. The distribution of fair housing opportunities within regions contributes importantly to low-income families’ access to the key supports for economic mobility—safe neighborhoods, quality schools, access to quality jobs and services. Although the geographies of poverty and race have both become increasingly suburban in recent decades, it is unclear whether the Proposed Rule, which is primarily intended to address a legacy of race-based housing inequities, will target poverty where it is, and where it is moving. Examining the Proposed Rule within the context of urbanizing poverty, we see three important considerations for implementation.

First, by prioritizing the reduction of poverty and racial isolation in Racially Concentrated Areas of Poverty (RCAPs) among the Proposed Rule’s four goals, HUD may underemphasize the challenges posed by significant and growing rates of racial and ethnic poverty in suburbs. In the Proposed Rule, HUD defines RCAPs as census tracts that are at least 50 percent of non-white and either have at least 40 percent poverty, or three times the average tract poverty rate within the same metropolitan area.

Importantly, as racial and ethnic poverty has increased in suburbs, it has not spread evenly across the landscape. Rather, it has tended to re-concentrate in certain communities, at levels below those in inner cities yet still high enough to elicit serious challenges. 

**Extreme-poverty neighborhoods**—those with poverty rates exceeding 40 percent, which aligns with HUD’s proposed definition of RCAPs—are still a predominantly urban phenomenon; 5.0 million of the 6.5 million people (78 percent) living in such neighborhoods in large metro areas are located in cities. Yet **high-poverty neighborhoods** (those with poverty rates between 20 and 40 percent) are much more evenly split; 16.4 million of their 40.6 million residents (40 percent) in large metro areas live in suburban communities. About one-third of the suburban poor today live in communities where the poverty rate exceeds 20 percent. As the work of George Galster and others has shown, many of the negative effects of neighborhood poverty begin to accumulate at rates exceeding 20 percent.

Racial and ethnic minorities predominate overall in suburban high-poverty neighborhoods, but not to the degree they do in urban high-poverty neighborhoods. Nonwhites and Hispanics make up 60 percent of the population in suburban communities with poverty rates exceeding 20 percent, compared to 75 percent of the population in urban high-poverty neighborhoods. The RCAP’s 50-percent minority threshold, like the 40-percent poverty threshold, may overlook areas of fast-growing poverty and minority concentration in suburban communities. Failing to grapple with the fair housing challenges posed by such communities now may eventually result in those places inheriting the racial and economic profile of their urban counterparts.

Second, it remains ambiguous as to whether the Proposed Rule would favor investment or mobility strategies to address racially concentrated poverty. The Proposed Rule currently specifies that “A program participant’s strategies and actions may include strategically enhancing neighborhood assets (e.g., through targeted investment in neighborhood revitalization or stabilization) or promoting greater mobility and access to areas offering vital assets such as quality schools, employment, and transportation, consistent with fair housing goals.” On the mobility front, research suggests that housing voucher families, particularly those receiving relocation counseling, fare better than average in measures of neighborhood quality.

Nevertheless, low-income families with housing vouchers may, and often do, move to suburban communities that face stark economic challenges. By 2008, nearly half of all voucher households in the 100 largest metro areas lived outside of big cities, and those households accounted for as much as 23 percent of the growth in the suburban poor population during that time. The foreclosure crisis of the mid-2000s led many suburban homeowners (including absentee investors) to rent to Housing Choice Voucher recipients, subsequently drawing low-income families into financially struggling suburbs. In the mid-2000s, East Contra Costa County, 40 miles inland from Oak-
opinions on priorities and on what works best. There have been frequent discussions about the meaning of structural racism and racial healing, about the interdependence of the various approaches to ending structural racism and achieving racial healing, about the difference between the aspirational and the practical, and about ways to ensure that the Network is truly reflective of a range of approaches and points of view. The glue, however, that holds all of the various points of view together is the common commitment to end racism, eliminate the belief in a racial hierarchy, and create a society in which the playing field is level for everyone, irrespective of race, ethnicity or national origin.

Next Steps

In early October, the Interim Working Group met in person to review the results of these four activities and to consider how to move forward in an inclusive manner and how to engage interested organizations and individuals in co-creating and launching the Network early in 2014. To move toward this launch, the Interim Working Group will be expanded and two more Working Groups will be formed from among volunteers who have expressed an interest in being more deeply involved in the planning. One Working Group will design a governance structure for the Network. At the moment, the thinking is that the Network should be organized around geographic locations (regions and/or states) to minimize logistical challenges, facilitate face-to-face meetings, and promote collaborative activities. The second Working Group will focus on developing a major campaign around a common theme that will include an array of activities in which organizations and individuals can choose to lead and/or participate. This campaign will represent the formal launch of the Network, and it will be designed to communicate a sense of urgency about the Network’s mission, serve as a vehicle for energizing and unifying the organizations and individuals who will participate, and help to build the capacity of the Network and the participants.

It is our firm faith that the collective and collaborative efforts of thousands of committed people will end racism in our lifetime. We invite you to join us on this journey.

If you would like to join our journey, please read our vision statement and sign it to indicate your support. It can be found on our web site, http://www.withinourlifetime.net/. If you would like more information about the Network and/or would like to get involved, please e-mail us at network@withinourlifetime.net. Or, feel free to contact any one of the seven members of the Interim Working Group.

local authorities have an obligation to take action.

HUD and state and local governments should also abide by fair housing siting rules to ensure that new low-income housing is not sited disproportionately in racially transitioning areas. Whiter and more affluent developing suburbs should be prioritized for funding, and incentives should be created to encourage fairness and stable metropolitan-level integration.

Finally, local, state and federal education authorities have an obligation to ensure that local school-district-boundary decisions, school-transfer policies, and capital decisions are fair under Titles II and VI of the 1964 Civil Rights Act and under state and federal constitutions.

B. Local Stable-Integration Plans

Housing markets are regional, and housing discrimination operates on a regional scale. Hence, regional remedies to address housing discrimination are the most effective. Nevertheless, dozens of communities have created effective local stable-integration plans. Case studies illustrate the potential value of proactive, multifaceted strategies. Such strategies can include:

• local fair-housing ordinances;
• public and private funding of pro-integrative home-loan and insurance-purchase programs;
• cooperative efforts with local school districts to ensure high-quality, stably integrated schools;
• community-safety programs in

local neighborhoods;

• marketing efforts to encourage local chambers of commerce, rental property owners and realtors to view diverse communities as potentially strong markets;

• public-relations campaigns to encourage positive media stories of community successes;

• financial support of pro-integrative community-based organizations; and

• support of public forums to defuse racial misunderstanding and promote the value of integrated communities.

Experience shows the success of such initiatives. For example, Hanover Park, a western suburb of Chicago, went through rapid racial change in the early 2000s, going from 47% non-white in 2000 to 62% in 2010 (still diverse but trending toward resegregation). In contrast, Oak Park, a community about 15 miles away that has a well-known stable-integration program, showed much greater stability, with a non-white share that grew from 34% to 36% during the same period.

Similar contrasts can be seen in the Cleveland area. Two suburban areas without stable-integration programs—Euclid and Maple Heights—each showed dramatic racial change between 2000 and 2010. The non-white share of the population increased by 23 points in Euclid (from 34% to 57%) and by 23 points in Maple Heights (from 49% to 72%). During the same period, two nearby communities with nationally recognized pro-integrative housing programs were much more stable. Shaker Heights went from 41%
non-white to 46% while Cleveland Heights went from 48% to 51%.

C. State and Metropolitan Actions against Exclusionary Zoning

Some states, either by legislative or judicial action, require all communities to provide for their fair share of affordable housing. Oregon and its largest metropolitan area, Portland, provide excellent examples of state and metropolitan-level actions that promote and maintain integrated communities. At the state level, Oregon’s Land Use and Development Commission Goal 10, promulgated in 1973, requires that regional and local comprehensive plans “encourage the availability of adequate numbers of needed housing units at price ranges and rent levels which are commensurate with the financial capabilities of Oregon households and allow for flexibility of housing location, type and density.”

At the regional level, the Portland metropolitan area’s regional planning policies have helped to reduce segregation by encouraging all developing communities to provide for their fair share of affordable housing. The area has a strong regional planning agency (Portland Metro) that enforces a regional growth boundary designed to focus new development in core areas. Research for the 1990s shows that the most common measure of black-white segregation—the Dissimilarity Index—declined more rapidly in regions with growth-containment policies. Black-white racial segregation has in fact decreased in the Portland region—it is now one of the nation’s least class-segregated metropolitan areas.

Similarly, Montgomery County, Maryland provides the best example of pro-integrative policies at the county scale. Thirty years ago, the County—a wealthy suburban area directly northwest of Washington, DC—adopted its Moderately Priced Dwelling Unit (MPDU) program. The MPDU requires that any new housing development of 50 or more units set aside 12.5 to 15% of the units for households earning 65% or less of the regional median income.

Non-whites have been the primary beneficiaries of the Montgomery County program. As of the late 1990s, people of color occupied 80% of the new public-housing rental units, and from 1991 to 1998, people of color accounted for approximately 55% of the purchasers of moderately priced dwelling units. At the same time, and at least partly as a result of these proactive housing policies, Montgomery County schools have made enormous strides in reducing the educational achievement gap between poor non-whites and affluent whites.

The general public simply do not understand the economic consequences of resegregation.

In New Jersey, where the state Supreme Court declared in the Mount Laurel cases that every city in a metropolitan region has an obligation to provide for its fair share of affordable housing, research has found gains in educational achievement, health and many other benefits for low-income non-white families moving to affordable housing in white affluent suburbia.

D. Metropolitan School Integration Strategies

The Supreme Court’s 1974 decision in Milliken v. Bradley stopped most school integration plans at the borders of a local school district. After Milliken, most school desegregation efforts were only temporarily successful—if not counterproductive—because they tended to encourage white flight to adjacent, whiter school districts.

Forty years of history and data demonstrate that integrated neighborhoods in regions with large-scale, metro-wide school integration plans were much more stable than in metropolitan areas without such plans. Census tracts without metro school integration, were more than 23% non-white in 1980 and were more likely to become majority non-white than remain integrated. In these areas, neighborhoods that were between 30 and 60% non-white had very little chance of remaining integrated. For example, neighborhoods that were 50% non-white had an 85% chance of becoming 60% non-white by 2009.

The likelihood that a neighborhood would remain integrated between 1980 and 2005-09 or resegregate is a function of its racial composition in 1980—for the 15 metropolitan areas that had large-scale school integration plans. In contrast with the results for metros with no such plans, integrated neighborhoods in regions with metro (or nearly metro-scale) school-integration plans were much more stable. Neighborhoods between 20 and 33% non-white were much more likely (between 55 and 65% likely) to remain integrated than to resegregate. And neighborhoods between 33 and 50% non-white had a roughly 50% chance of remaining stably integrated over 25 years.

III. Conclusion

More than half of suburban residents in America’s largest metropolitan areas live in places that are threatened economically because of unaddressed housing discrimination and the resulting resegregation. In these communities, homeowners and business owners alike lose equity every year because these laws are not enforced. These communities that were built at great public expense will unnecessarily become blighted and abandoned as middle-class families move out, and (Please turn to page 12)
citizens will be taxed to create new communities of escape. Rather than becoming America’s most expensive disposable product, these communities should be recycled, renewed and redeveloped. As the largest suburban block of voters—and the most politically volatile—diverse suburbs should be able to command the attention of political leaders and policymakers. These communities, in combination with central cities and predominantly non-white suburbs (which have many common interests), have the metro majority of local officials, legislators and Members of Congress, and therefore should be able to ensure the enforcement of existing laws and the creation of new laws necessary to stabilize neighborhoods and schools in metro America. All of these types of communities are hurt by current patterns of housing discrimination and resegregation. Together, they could form a majority political coalition to advance these reforms.

The largest barrier to this change is lack of understanding. The general public, particularly the politically pivotal diverse suburbs and their elected officials, simply do not understand the economic consequences of resegregation or the clear benefits that strong fair-housing policies provide to their communities. Thus, it is important to begin large public-education efforts to help the integrated suburbs understand what is happening to them and how many communities are in a similar position. These efforts would explain that stronger fair-housing policies would strengthen their residential market, increase prime low-cost credit, stabilize their schools, and allow strong potential for redevelopment. At present, many in these areas think just the opposite; they incorrectly believe that fair housing will increase the speed and severity of the already occurring resegregation and decline.

A key to stability—or transition—is what residents and potential residents think the future of a community will be. Many whites are perfectly willing to live in a diverse community but do not want to be in a predominantly black or Latino community, or a community that shows clear signs of economic and social decline. Similarly, they are very willing to have their kids go to a diverse school, but not to one that has resegregated or is in the process of rapid transition. There is, of course, a wide range of preferences and tolerances for diversity among all racial and ethnic groups—and the key is to invest in strategies that will increase tolerance and promote stability over time.

Most currently diverse communities are in the process of resegregation, but have no real plans to do anything about it. Diverse suburban communities need technical support (since they have very limited staff and knowledge) to help them deal with their housing and school issues and, if possible, financial support to implement their plans. The truth is that most diverse suburbs have no idea of how to address resegregation, and they have no external framework of advice and support. A federal or state initiative of school and housing agencies to support stable and successful diversity in suburban communities would be very well received. If this initiative was managed as a purely voluntary process, then it would be a political advantage rather than a cost.

Because the diverse suburbs do not realize how many communities are in a similar situation, they are more likely to avoid discussing the issue of resegregation for fear that calling attention to the problems may make them worse. But if public-education efforts made diverse suburbs aware that resegregation is common, they could then cooperate with the large number of similarly affected communities and develop political and reform efforts.

Existing membership organizations for municipalities, such as the League of Cities, involve all types of cities and suburbs, rich and poor, white and non-white. As voluntary membership organizations, they risk losing members who disagree with their actions. Thus they are consensus-oriented and status-quo-oriented and may be unlikely to take any strong position on the issues necessary for suburban stability. Given this reality, the diverse suburbs must form their own organizations, support them with dues, and seek government and private grants to fund their reform efforts. Once created, these organizations should use their political power, in every way they can, at the state and federal levels, to ensure that current laws are enforced or changed to support their stability and redevelopment. Some relatively new organizations of older suburbs exist—in Cleveland, Philadelphia, Michigan and New Jersey, for instance—but this process needs to accelerate.

Metropolitan America is at a crossroads. The places in the country that have worked to create stable integration have been rewarded for their efforts. Louisville, Raleigh, Portland and Montgomery County are not only some of the most desirable places to live for people of all races in the United States, but have strong, resilient economies. If racially diverse suburbs can become politically organized and exercise the power of their numbers—in their own self-interest—they can help to ensure both the stability of their communities and the future opportunity and prosperity of a multi-racial metropolitan America. ❑
land, saw a rapid increase in residents with Housing Choice Vouchers. When the housing market crashed, these families were left at a far remove from economic opportunities, social supports, and labor market connections. In southern Cook County, Illinois, voucher residents increased rapidly during the same time period, particularly as many neighborhoods in the city of Chicago where public housing was redeveloped became relatively more expensive. But those suburban municipalities continue to suffer from a lack of jobs and services, and many are in very poor fiscal health. Residents of East Contra Costa and southern Cook counties may be better off than their counterparts in extremely poor urban neighborhoods in Oakland or Chicago—but they could be doing much better.

None of this means that mobility strategies—particularly in tandem with stepped-up mobility counseling—should not be a central part of local and regional efforts to further fair housing goals. However, investment strategies must be part and parcel of any region’s plan to further fair housing, and such investments are increasingly as critical across economically struggling suburban areas as in inner-city neighborhoods. And the sorts of investments needed in those places are explicitly not around affordable housing development, but rather around economic regeneration.

That economic imperative relates to a third consideration around how fair housing rules apply in suburbia, which goes to the question of regional capacity. Suburban communities are often too small to qualify as entitlement communities, so implementation of HUD’s Proposed Rule in such jurisdictions would likely fall to “qualified urban counties” via Community Development Block Grants or HOME Investment Partnerships; or to the small PHAs that tend to operate in those communities. Smaller municipalities typically have little capacity to tend to the needs of poor families, and when it comes to economic development, they often compete with one another for opportunities despite the fact that they inhabit part of a wider regional economy and labor market.

With the right incentives, however, suburbs could work together regionally and thereby provide poor families with access to a wider spectrum of employment, educational, and service opportunities. As written, the Proposed Rule encourages, but does not require, the participation of various local stakeholders—such as local departments of transportation, overlapping PHAs and municipal governments—in establishing goals for the new Assessments of Fair Housing. Bruce Katz and Margery Austin Turner argue that HUD should focus its efforts on providing regional solutions to low-income housing needs. They note that there are nearly 2,400 individual Public Housing Agencies nationally, with over 1,500 located in the largest metropolitan areas—often in overlapping housing markets and municipal jurisdictions. These PHAs may maintain different eligibility requirements, housing standards and waiting lists; as a result, it is difficult for low-income families to navigate across PHAs—even those that fall within the same geographic area.

Significant restructuring of PHAs would require Congressional approval. However, through HUD’s Proposed Rule, the Department could “vigorously encourage the formation of regional consortia,” as Katz and Turner suggest. There are several examples nationally of such regional housing models. The Chicago Regional Housing Choice Initiative is a collaboration of eight PHAs and housing organizations that have helped to sensibly streamline the voucher application process across multiple jurisdictions, while providing low-income families with relocation counseling. The effort has reduced administrative costs and im-

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**PRRAC Update**

- MIT Professor Xavier de Souza Briggs, a long-time member of PRRAC’s Social Science Advisory Board, was recently appointed Vice-President of the Ford Foundation’s program on Economic Opportunity and Assets (one of three core areas of the Foundation’s work).
- Former PRRAC Deputy Director Saba Bireda was recently appointed as Senior Counsel in the Office for Civil Rights at the U.S. Department of Education. Prior to joining the Department, she was policy and legal advisor for EducationCounsel LLP.

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The Rule’s efficacy will depend, in large measure, on how successfully it promotes racial and economic integration in America’s suburbs, where more and more of its low-income minority populations live.
proved the mobility of low-income families to areas of higher opportunity. More explicit guidelines for HUD grantees to engage in regional collaborations to meet fair housing goals would help ensure that well-intentioned investment and mobility strategies do not run aground on the shoals of suburban fragmentation and inter-jurisdictional competition.

HUD’s Proposed Rule promises to better fulfill its statutory obligation to affirmatively further fair housing by addressing a legacy of racial segregation and concentrated poverty in the United States. The Rule’s efficacy will depend, in large measure, on how successfully it promotes racial and economic integration in America’s suburbs, where more and more of its low-income minority populations live. Only by addressing growing concentrations of poverty in suburban and urban communities alike can we hope to avoid repeating the mistakes of the past, and to secure greater social and economic opportunities for low-income people and places in the future.

Resources


“Strategies and Policies for Defending and Expanding the Middle Class in Metropolitan America” (Building One America, 2012)

Philip Tegeler, “Good News and Serious Challenges in Brookings Report on Suburban Poverty” (May 2013)


(MyLinks available at www.prrac.org/projects/diversesuburbs.php)