

# PRRAC

*Poverty & Race Research Action Council*

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January 10, 2023

To: HUD PIH and PDR staff (semap@hud.gov)  
From: Poverty & Race Research Action Council (PRRAC)  
Re: Comments on proposed SEMAP reforms

Dear colleagues,

Thank you again for the opportunity to participate in the December 12, 2022 stakeholders listening session on possible reforms to the Section 8 Management Assessment Program (SEMAP) rule. We are writing to follow up on a few of the points we raised at the listening session, and to stress the importance of aligning the new rule with HUD's duty to affirmatively further fair housing.

## Locational outcomes

We strongly support HUD's consideration of locational outcomes – including measuring progress in lowering the share of families with vouchers in high poverty neighborhoods and increasing the share of families in low poverty neighborhoods. To make such a metric successful, locational outcomes should be given significant weight (30%) in the overall SEMAP score, and several additional factors should be taken into account:

> The standard threshold for defining a “high poverty” neighborhood is a census tract with 30% or greater poverty rate. Selecting a higher poverty level for SEMAP would be ineffective for several reasons: first, it would exclude the vast majority of high poverty neighborhoods, and many metro areas and PHAs with few (or no) 40% poverty neighborhoods would be under no pressure through SEMAP to reduce poverty concentration in their programs; second, the social science literature on the impacts of neighborhood poverty on families with children primarily focuses on neighborhoods with a poverty rate higher than 30%; and finally, a 40% standard could have the effect of rewarding PHAs for meaningless progress (for example, giving PHAs credit for family moves from one high poverty neighborhood to another).

> In addition to measuring progress in deconcentrating poverty, we recommend giving some credit for a PHA's “baseline” performance – for example, the ratio between the percentage of families with vouchers in low poverty neighborhoods vs the percentage of voucher-affordable units in those neighborhoods (using 110% of the Small Area FMR as the standard).<sup>1</sup>

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<sup>1</sup> This is the approach used in the CBBP-PRRAC report published in 2019, [Where Families With Children Use Housing Vouchers: A Comparative Look at the 50 Largest Metropolitan Areas.](#)

> PHAs with areas of operation limited to low opportunity, higher poverty areas should not be exempted from the SEMAP locational standard, or held to a lower standard. These state law geographic limitations are relics of racist mid-twentieth century policies designed to keep public housing out of white areas, and HUD should not be condoning or supporting these policies with a new SEMAP regulation. For PHAs with limited jurisdiction, HUD should count all families porting out to other PHAs in the locational metric (including all vouchers absorbed by receiving PHAs), and give PHAs credit for inter-PHA agreements to facilitate moves across PHA jurisdictional lines.

> We recommend that families with young children should be measured separately in a new SEMAP locational metric, particularly the percentage increase of families with young children moving to low poverty neighborhoods, as it has been shown that these families gain the greatest benefits from such moves. PHAs receiving housing mobility services funding from HUD should be held to a somewhat higher standard on this measure.

### Inspections and voucher administration

Delays in inspections and tenancy approval undermine the voucher program and make it more difficult to market the program in higher opportunity areas. The SEMAP indicator involving Housing Quality inspections should emphasize rapid completion of inspections as contemplated by HUD regulations, with minimally adequate performance set at 15 days (from the RFTA to the completion of the inspection), and high performance set at five business days. Similarly, the total time from RFTA to execution of the lease should be included in SEMAP, with high performance scores set at seven business days.

### Rewarding high performance; calling out low performance

Outstanding performance on SEMAP should garner concrete benefits for PHAs and their clients, including administrative fee bonuses, enhanced eligibility for voucher-related funding competitions, and priority for additional vouchers, when vouchers are reallocated from underperforming PHAs. SEMAP scores should also be publicly announced and accessible on HUD's website to encourage community oversight of the program.

Sincerely,



Philip Tegeler  
Executive Director

cc: Demetria McCain, HUD FHEO  
Sasha Samberg-Champion, HUD OGC