

MORE PLACES TO LIVE

A STUDY OF INTERJURISDICTIONAL HOUSING MOBILITY PROGRAMS

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December, 1982

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ACKNOWLEDGEMENTS

This publication was prepared by:

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The authors wish to gratefully acknowledge the assistance of Paul Davidoff, Executive Director, and Cindy Roeser of the Institute, for their generous assistance.

We are also particularly indebted to Joyce Walther of HUD, who assisted us throughout the project, and to Trudy McFall, who initiated the project.

Finally, to all of those people in the various agencies and organizations who responded to our request for information, we offer our deep gratitude. Without your assistance, the study could not have been completed.

This publication was prepared with the aid of the Community Development Block Grant Secretary's Discretionary Funds. However, the information and conclusions contained herein are those of the Metropolitan Action Institute and do not necessarily reflect the views of the U. S. government in general or the U.S. Department of Housing and Urban Development in particular. Neither the U.S. government nor HUD makes any warranty, expressed or implied, nor assumes responsibility for the accuracy or completeness of the information herein.

PART I -- INTRODUCTION AND BACKGROUNDPURPOSE OF STUDY

The purpose of the Study is to describe and evaluate interjurisdictional housing mobility programs. Interjurisdictional housing mobility programs are designed to increase access to housing across jurisdictional lines for lower income and minority households. The programs both increase the ability to cross jurisdictional lines and provide the economic assistance households need to gain access to housing in new locations. The Study not only presents types of interjurisdictional mobility programs, including case studies of specific programs, but it also sets forth principles for the development of interjurisdictional mobility programs and evaluates current programs.

It is our hope that this Study will be helpful to those involved in or interested in interjurisdictional mobility programs. In a time when the federal government has greatly reduced its programmatic efforts in support of mobility programs and in a time when housing assistance funds are severely restricted, this study can serve several objectives. It offers a retrospective evaluation of a set of specific programs designed to ensure mobility opportunities for lower income households.

It also provides a concrete set of guidelines for the development of mobility programs--be they voluntary at present, a response to proposals that a housing voucher allow a household to live anywhere regardless of jurisdictional boundaries, or some future program established specifically to guarantee equitable opportunities to choose where to live.

We believe this study provides a valuable perspective of a long and important history of efforts to guarantee that households receiving housing assistance have the opportunity to choose where they want to live.

THE STUDY

This study's major purpose is to document the development of interjurisdictional housing programs. Moreover, it seeks to explore many issues raised by attempts to guarantee that Americans receiving housing assistance have the opportunity to choose where they want to live. To these ends:

Part I of the study provides background discussion for the study, including its origin and the methodology used for its preparation.

Part II describes the major means by which interjurisdictional housing programs now operate, and includes Case Studies illustrating each. Four such mechanisms are identified: 1) Reservation or Set-Aside of Certificates, 2) Exchange or Transfer Programs, 3) Agreements to Honor Certificates, and 4) Programs Administered Over More than One Jurisdiction by a Central Agency. In virtually all cases, these programs utilize Federal housing subsidies as their basic tool, often in combination with some degree of client counseling.

The study concludes in Part III, with an evaluation of the ease with which these mechanisms can be administered, and the extent to which they follow the guiding principles for interjurisdictional programs developed earlier in the study. Finally, a set of principles - guidelines for the design of equitable interjurisdictional programs - is listed by the authors.

HUD's long-standing role in the development of housing mobility programs is evolving. Indeed, HUD has been the target of criticism from both supporters and opponents of these programs. In an effort to evaluate the many issues arising from the programs' development and implementation, the Office of Planning under the Assistant Secretary of Community Planning and Development, conceived of this study and asked Metropolitan Action Institute, under a Cooperative Agreement, to carry it out. HUD's interest in this study was to develop an historical and current expose on interjurisdictional housing mobility programs in the United States. Since the Cooperative Agreement was designed, the Office of Planning has been abolished and the programs it administered which supported mobility, have been ended or are no longer being funded.

Metropolitan Action Institute (formerly Suburban Action Institute) was selected for the study because of its past involvement and expertise in housing rights issues. The Institute, founded in 1969 as a planning and advocacy agency to protect rights and expand opportunities for lower income and minority persons, has directed the use of research, planning and legal tools toward these objectives.

Beyond this report's preparation, the Cooperative Agreement between HUD and the Institute directed the group to work in metropolitan areas to evaluate and enhance lower income and minority-oriented housing programs which permit mobility throughout a region. This second division of work called upon the Institute to...

...act as a clearing house for information on these programs, to provide intensive training and technical assistance to agencies and organizations involved in these and supporting housing programs, and to work with organizations in the evaluation and monitoring of housing and community development programs and policies and their implementation in terms of meeting housing assistance needs.

This study is the final product of the Cooperative Agreement's first part. The second part focused on three major tasks: (1) to evaluate states' ability to ensure housing availability and mobility for lower income and minority peoples given proposed new federal housing programs, (2) to identify the impacts of those proposed Programs on lower income and minority households, and on efforts to ensure mobility throughout metropolitan areas, and (3) to find out how local jurisdictions and organizations can stimulate lower cost housing production, support housing programs and leverage available funds to increase lower income and minority housing.

METHODOLOGY

Metropolitan Action Institute surveyed agencies and organizations throughout the country to obtain information about any interjurisdictional housing mobility effort that was underway. The survey consisted of notices in fifteen national planning and housing periodicals; direct letters requesting information sent to: regional agencies that receive "701" funds, non-metro regional agencies that receive "701" funds, urban counties (under the CDBG designation), A-95 clearinghouse agencies, public housing agencies, and state housing agencies; and personal telephone calls to those agencies believed most likely to be involved in interjurisdictional housing mobility programs, including: agencies with Areawide Housing Opportunity Plans, Agencies with Regional Housing Mobility Programs, and State Agencies administering the Section 8 Existing Housing Assistance Program.

The Institute received over 100 responses to the survey, each describing an interjurisdictional housing mobility program or related efforts to provide housing for lower income and minority persons. The staff reviewed the responses and selected those that actually represented on-going programs directed specifically to the provision of interjurisdictional mobility. These programs were divided into several major categories.

Each of the programs was investigated by telephone with key staff members administering the programs identified. In general, information was collected in accordance with a research form prepared for collecting consistent data about the various programs. From the information gathered, staff members wrote detailed descriptions of the programs that were most complete and active. Some programs were eliminated at this stage either because they were not appropriate to the project (that is, they were not interjurisdictional housing programs) or because not enough information was available on the programs because it had not been in operation long enough or because it was not active enough to generate sufficient information.

After the detailed information was obtained for each of the programs selected, final prototypes were selected and materials were developed about the various types of interjurisdictional housing mobility programs. Case studies were prepared and overview descriptive and evaluative materials were prepared about each of the types based on the interviews and research conducted. Each of the case studies was reviewed by the agency staff person administering the program.

The evaluation and principles, as well as other discussions prepared for the Study, are the result of group staff discussions, research and background materials on the interjurisdictional housing mobility programs, and other research and discussions held with those involved in and concerned about the mobility programs.

The Study was prepared to contain the prototype interjurisdictional housing mobility programs, each with several case studies as examples of how such a program operates. The evaluation and conclusions offer some general findings from the Project and a set of principles which was developed specifically to address some of the issues uncovered during the Project regarding the implementation of interjurisdictional housing mobility programs.

PART II - INTERJURISDICTIONAL HOUSING MOBILITY PROGRAMS

RESERVATION OR SET-ASIDES OF CERTIFICATES

THE MECHANISM IN BRIEF

This mechanism allows for jurisdictions to commit a portion of their Section 8 certificates or for a region or state to set-aside certificates for use throughout a designated or participating region. The certificates are held in a central pool specifically for eligible households who wish to move from one jurisdiction to another participating jurisdiction within the region.

Of all the mechanisms for interjurisdictional mobility, the reservation or set-aside of certificates is the most distinctive because the certificates are expressly and only available for interjurisdictional moves. Other mechanisms discussed in this manual allow for interjurisdictional moves but are not limited to such moves. In this mechanism, no exchange of certificates from one jurisdiction to another occurs precisely because the central or reserved pool of certificates makes that unnecessary.

HOW THE MECHANISM WORKS

The reservation or set-aside of certificates for interjurisdictional moves creates a pool of Section 8 certificates which eligible households can use when they wish to move outside of the jurisdiction in which they presently live. The programs usually operate alongside other Section 8 Existing housing programs administered by local housing authorities which handle moves within the jurisdiction.

The pool of certificates results either from: 1) participating jurisdictions agreeing to reserve a portion of their Section 8 certificates for interjurisdictional moves, 2) set-aside of Section 8 certificates by a state agency, or 3) the use of bonus certificates for interjurisdictional moves within participating jurisdictions.

Regardless of how the pooling occurs, there are generally cooperative agreements or memoranda of agreement between the participating jurisdictions and the regional or state agency administering the program. The agreements set forth the proportion or number of certificates placed in the pool and generally identify the number of certificates allocated to each jurisdiction for eligible households moving between jurisdictions. The agreements also outline the various responsibilities of each agency participating in the agreement.

Where it is the reservation of their certificates which creates the central pool for interjurisdictional moves, each participating jurisdiction agrees to commit a certain percentage or an established number of the Section 8 Existing certificates that they are allocated for a designated period. These certificates are reserved for any eligible household that desires to move into their jurisdiction from another jurisdiction, or, in rare instances, from their jurisdiction to another.

Where the central pool of certificates results from a set-aside of certificates by the regional agency or council of governments, most often they are from a special allocation, such as a Bonus Section 8 resulting from participation in an Areawide Housing Opportunity Plan (AHOP) program. Other programs rely on a set-aside from a state agency from its own allocation of Section 8 Existing certificates. In either instance, the set-aside is applied to the designated jurisdictions who have agreed to participate in the interjurisdictional program.

There are generally two types of programs within the reservation or set-aside mechanism. In one type, certificates are allocated to jurisdictions for eligible households within that jurisdiction who desire to move to another jurisdiction. This program type is generally the more complicated of the two because the programmatic responsibilities for administering the certificate program must be spelled out by the agency which has administrative oversight for both the jurisdiction which issues the certificate and the jurisdiction which administers the certificate after the household moves. The program for the Baltimore region is an example of this type.

In the second program type, the certificates are allocated to each participating jurisdiction for eligible households who desire to move into that jurisdiction from another. In these cases, the eligible household is generally referred to the administering agency in the jurisdiction to which they have chosen to move, after which that agency is responsible for all aspects of administering the certificate. This program type appears to be the more common of the two. The Northcentral Texas Council of Governments, The Southwestern Virginia Planning District Commission, The Metropolitan Washington Council of Governments, and the Capitol Region Council of Governments are examples.

ADMINISTRATION

In most reservation or set-aside interjurisdictional programs, eligible households are taken from ongoing waiting lists for the

Section 8 Existing housing program when they express a desire to move to another jurisdiction than the one in which they currently live. Generally, households are taken on a first come, first served basis for the pool of certificates just as is true in the regular Section 8 Existing housing program. If there are no longer any special certificates available the household remains on a waiting list, just as in the regular Section 8 Existing housing program. In no instance does it appear that the household loses its position on the waiting list it first entered.

Some programs, in establishing the interjurisdictional program at the outset, surveyed the current waiting lists to identify those households who desired to move to another jurisdiction. In all programs, there is an on-going procedure by which households still on waiting lists or coming onto waiting lists can obtain a certificate from the central pool for a move to another jurisdiction. Although in virtually every program there are fewer certificates available for households wanting interjurisdictional moves than for those wishing to remain in their present jurisdiction, there appears to be less demand for interjurisdictional certificates. As a result, often those households receive a certificate sooner than if they stayed on the waiting list for their original jurisdiction.

For example, in the program within the Baltimore region (where a jurisdiction makes certificates available to its residents who wish to move to another jurisdiction) or in the program within the Hartford region (where those households on the waiting list but living elsewhere are eligible), households receiving a pooled certificate may advance on the waiting list faster than would be true were they not making such a move. Also, in the Hartford region program, as well as others, where the participating jurisdiction uses the pooled certificates for households who are not presently residents of their jurisdiction, the programs face the added controversy of serving non-residents before their own residents.

COUNSELING AND OUTREACH

In all reservation and set-aside programs, each participating administering agency advises eligible households of the availability of pooled certificates for a move into another jurisdiction. Beyond this, these programs appear to vary widely as to the amount of counseling and outreach provided.

Some programs offer brochures explaining the program and/or information about participating jurisdictions. Others offer counseling and other services to assist the household who have decided to move to another jurisdiction. In virtually every

instance, however, it is the regional agency or the council of governments which takes on these activities. These agencies will prepare the brochures, collect and publicize information, offer counseling and make referrals, and carry out other oversight activities.

PROS AND CONS

The reservation or set-aside of certificates for an interjurisdictional housing program is a relatively simple way to design such a program. Once the programs are established, they are largely administered in much the same way as the regular Section 8 Existing housing program and are paid for by Section 8 Existing administrative funds. They do, however, require the participation of some agency which can provide oversight and coordination, such as a regional planning agency or a council of governments. They also require the negotiation necessary to gain the agreement of the participating jurisdictions. In most instances, gaining this agreement has required substantial amounts of work on the part of the oversight agency.

In these programs, the ability of eligible households to make a desired move is limited by the availability of a specific pool of certificates. Participating jurisdictions have differing amounts of certificates that they are able or willing to pool and it is difficult to develop a means for adding more certificates to the program as it continues to operate. Therefore, the amount of mobility that can take place throughout a region is limited by the precise number of certificates that are available within the pool.

The programs are, however, largely regarded as successful by the regional agencies in the regions where they are in operation. In most places, all of the available certificates have been used and, in some instances, it was reported that more certificates would also be used were they available.

RESERVATIONS OR SET-ASIDES OF CERTIFICATES PROGRAMS

*Baltimore Regional Planning Council

Baltimore, Maryland

1,143 certificates were issued to the region (900 over and above regular funding levels) for use with participating jurisdictions.

*Capitol Region Council of Governments

Hartford, Connecticut

50 certificates made available to four public housing authorities through bonus funds from the Areawide Housing Opportunity Plan program.

Delaware Valley Regional Planning Commission

Philadelphia, Pennsylvania

55 state-wide Section 8 certificates each to Trenton and Camden for interjurisdictional moves.

*Metropolitan Area Planning Council

Boston, Massachusetts

600 state-wide certificates have been made available to 35 public housing authorities as part of the Regional Housing Mobility Program.

Metropolitan Washington Council of Governments

Washington, D.C.

110 bonus AHOP Section 8 certificates set-aside for Washington, D.C.. and Montgomery and Fairfax counties for interjurisdictional moves.

*Northcentral Texas Council of Governments

Arlington, Texas

66 certificates reserved by seven jurisdictions through a Regional Housing Mobility Program. Program ended May 31, 1982.

Southwestern Pennsylvania Regional Planning Commission

Pittsburgh, Pennsylvania

Details not available.

Southwestern Virginia Planning District Commission

Norfolk, Virginia

7 jurisdictions committed 10% of their Section 8 certificates for interjurisdictional moves.

Ventura County, California

status unclear: application for mobility certificates by several jurisdictions.

*Case study in this chapter.

REGIONAL PLANNING COUNCIL
BALTIMORE, MARYLAND

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The Agency and its Region

The Regional Planning Council was established by the Maryland General Assembly in 1963. Its jurisdiction covers the counties of Anne Arundel, Baltimore, Carroll, Harford, and Howard, and the City of Baltimore. The RPC has little independent authority to implement projects or programs. In those instances in which RPC does have implementation responsibility, the authority to do so usually comes through cooperative agreements with the region's local governments.

The region covered by the Baltimore SMSA has a population which is presently over 2,000,000, of which approximately 25% is Black. In 1980, about 30% of housing units were in buildings with 2 or more units. Approximately 40% of households were renters. From 1970 - 1980, the number of housing units in the region increased by about 22% while the number of people employed in the region grew by about 13%.

The Program in Brief

The Regional Section 8 Existing Program, in operation in the Baltimore region, is designed to expand the options for housing choice by removing administrative barriers, thereby allowing Section 8-eligible households to move interjurisdictionally within the Baltimore region. The program depends on cooperative agreements among four levels of government: the U.S. Department of HUD, the Maryland Department of Economic and Community Development, the Regional Planning Council, and seven local Section 8 offices.

Through this program, Regional Section 8 certificates are reserved for households wishing to move from one jurisdiction to another, while local Section 8 certificates are available for households who wish to stay. The program utilizes bonus certificates made available to RPC through its participation in the Areawide Housing Opportunity Plan (AHOP) program as well as a portion of Section 8 certificates allocated annually to the region.

How the Program Works

The Regional Section 8 Existing Program began operation June 1, 1979, with a total of 1,143 certificates. Nine hundred of these certificates represent an allocation of housing assistance over and above the regular funding levels available to the Baltimore region. An additional 350 certificates were added to the program in 1981.

The certificates are distributed among the jurisdictions in the region in accordance with the allocation formula and procedures used for the distribution of all housing assistance. The distribution of the certificates was as follows:

| | <u>FIRST ALLOCATION</u> | <u>SECOND ALLOCATION</u> |
|-----------------------|-----------------------------|------------------------------|
| Baltimore City | 677 | 99 |
| Baltimore County | 209 | 73 |
| Anne Arundel County | 17 | 22 |
| Annapolis | 25 | 5 |
| Carroll County | 94 | 62 |
| Harford County | 28 | 10 |
| Howard County | 10 | 20 |
| Handicapped set aside | 83 | 59* |
| | <u>1,143</u> | <u>350</u> |

*Handicapped and abused persons.

Regional Section 8 certificates allocated to the jurisdictions are to be used only by residents of those jurisdictions who wish to move. The program is designed to work as an integral part of local Section 8 programs and is operated through local Section 8 offices.

In developing the regional component, there was a consensus that households on existing Section 8 waiting lists should be given first opportunity to use these regional certificates. A letter was sent to the 27,000 families on waiting lists throughout the Region indicating that a limited number of certificates were available for interjurisdictional moves. Households were to return a postcard indicating if they were interested in moving, where they would like to move, and their reason for desiring to move. Only those households whose postcards expressed a preference for moving were contacted about the regional program.

Just as in the local Section 8 program, families who have been on the waiting list the longest are served first. As part of the process, the Regional Section 8 Program is thoroughly explained to each interested family. Housing counselors work with the family to determine if an interjurisdictional move is what the family really desires.

In addition to the waiting list survey card process, households may enter the Regional Section 8 Program in the following ways:

-- New applicants for housing assistance are informed of the regional program and those who are interested are placed on a "regional" waiting list.

-- If regional certificates are available, families at local Section 8 orientations are told that they may look for housing in other jurisdictions. If a family finds a unit outside the issuing jurisdiction, the local certificate may be exchanged for a regional one, permitting the family to move.

-- Two groups of certificates are "set-aside" for special purposes. Eighty-eight certificates are reserved for Independent Groups Residences (IGR) to service the handicapped. Certificates are allocated to agencies who help persons in their caseloads form a handicapped family and live together. These certificates do not have to be utilized for interjurisdictional movement, although they are in some cases. An additional 50 certificates were set-aside from a second (1981) allocation to assist abused persons , as well as handicapped families.

-- Another set-aside is made up of 125 "displacement" certificates included in Baltimore City's total allocation. These certificates assist families who are being displaced, either by public action or private investment. These certificates are designed to enable families to remain in their neighborhood and thereby help maintain economically integrated communities.

-- Finally, since Carroll County had no Section 8 program prior to its participation in the Regional Program, there was no waiting list to utilize. Advertising and other outreach methods were used to publicize the program's availability.

Administratively, implementation of Regional Section 8 Program is complex. Certificates are issued by the jurisdiction where the eligible household lives, but they are administered by the jurisdiction where the household moves. Paperwork is transferred between jurisdictions, with the Regional Planning Council maintaining central files and disbursing funds. The RPC computerizes family and financial data and monitors the local programs. The State of Maryland's Community Development Administration serves as the legal Public Housing Agency, so there are also monitoring and financial functions carried out at that level. Memoranda of agreement are in place which detail the responsibilities of each party.

Counseling and Support Activities

Regional Planning Council operates a Regional Housing Counseling and Referral Network which provides information to families about available housing resources. Eleven housing counselors, located in housing agencies throughout the region, have been hired through the

use of Bonus Community Development Block Grant Funds. These counselors are hired by the local jurisdictions. Contractual agreements outline their responsibilities to the interjurisdictional program.

Counselor responsibilities and time commitments differ with each location. In some locations the counselors work only on the Regional Section 8 Program; some do only homeownership counseling and some do comprehensive counseling. However, their primary responsibility is to assist families who want to move into different areas in the Baltimore region and to help these families with any problems that may develop before, during and after the move.

RPC provides extensive training for all counselors. This training covers technical areas such as program regulations, basic counseling skills, budgeting, money management, credit counseling, etc. Ongoing information is provided about the housing resources and opportunities in the region.

Housing counselors are involved in every phase of the Regional Section 8 Program. Counselors work with clients to help them to determine if an interjurisdictional move is right for that family. After a household has decided to participate in the interjurisdictional program, the housing counselor provides further information. The household may then look for housing on their own or call on the counselor for further assistance. As needed, a household may contact the counselor in the jurisdiction where they are searching for housing for additional information on the jurisdiction's housing market, lists of landlords who have accepted Section 8 families in the past, maps of public transportation, and other useful data.

With the more difficult to place families, such as those with many children or with poor credit and no references, the housing counselors become more actively involved in trying to find a suitable unit. If a family cannot find a unit within the initial 60 days, extensions can be granted by the Section 8 administrator. If a family does not check in with a housing counselor within 30 days of receiving a certificate, the counselor contacts the family and makes sure that they are aware of the expiration date.

After a family has located a suitable house or apartment and been accepted by a landlord, the housing counselors will assist the family to complete all paper work, notify them that the unit has been inspected and found acceptable and arrange, with the family, a move-in date. Following the move, the counselor maintains contact with the household to help solve any problems that may develop, including the mediation of landlord-tenant problems.

The Regional Housing Counseling and Referral Network exists as an integral part of the other housing programs operated by RPC and other housing agencies in the region. Counseling activities offered by the Network facilitate the operation of all housing programs in the region. Thus the network not only assists lower income persons to have greater access to housing, but it helps agencies to operate more successful housing programs.

Evaluation

As of June 30, 1982, 1152 families had leased units in the Regional Section 8 Existing Program. A total of 663 Baltimore families had signed leases and, of those, 182 moved within Baltimore City, 406 moved to Baltimore County, and 75 moved to other jurisdictions within the region. At the same time, 335 families moved into Baltimore City, with 182 moving from within the City, 139 from Baltimore County, and 14 from other jurisdictions within the region.

The Regional Planning Council also performs a client survey to assess satisfaction, evaluate the moves, and determine client needs. The first survey was conducted after three months, the second to families who have been in the program for over a year or who have moved from their original unit.

The sampling is small; however, the first results indicated a high level of satisfaction with the program, as well as a substantial amount of interest in receiving supportive counseling. The second survey revealed that 83% of families making moves are satisfied. This level of satisfaction is even higher than the 78% level shown from the three-month survey.

Of the respondents in the second survey, over 50% like the move because of convenience to shopping and other services, the neighborhood and neighbors, and the size of the apartment. Over 20% like the move because they are near friends and/or relatives, transportation, or schools; the amount of rent; or because they have lived in the area before.

In response to what was liked least, over 15% indicate that they are too far from friends or relatives, work or work opportunities, and transportation.

Clients indicate an interest in receiving counseling on job training and employment opportunities, home ownership possibilities, education opportunities, and how to lower utility bills.

In 1975, there were approximately 30,000 assisted units available in the region. Of this total, 70% or about 21,000 were in Baltimore City and 30% or approximately 9,000 were in the remainder of the region. Both the limited number of units and the limited places in which these units were located restricted the housing opportunities and choices available to lower income persons.

In 1980, there were approximately 46,000 assisted units in the region. The number of assisted units outside the city increased to over 15,000, raising the counties' share of assisted housing to 32%. Thus, not only has the number of assisted units increased, but the geographic choice for lower income families has been expanded.

CAPITOL REGION COUNCIL OF GOVERNMENTS
HARTFORD, CONNECTICUT

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The Agency and its Region

The Capitol Region Council of Governments (CROCG) consists of the City of Hartford and 28 suburban towns. There is no county government structure in Connecticut and, as a consequence, all planning and implementation decisions are made by local jurisdictions with the assistance of regional agencies.

The total population for the region is approximately 700,000, and approximately 15% of that population is minority. Of the 213,000 housing units in the Hartford SMSA in 1970, just under half were located in buildings of 2 or more units, and about 40% were occupied by renters.

The Program in Brief

The Capitol Region Council of Governments has set-aside 50 Section 8 Existing certificates for participating local housing authorities with the condition that they be used for households on current waiting lists but not presently residing in the jurisdiction. The Section 8 Existing certificates are Bonus certificates made available to CROCG through its participation in the Areawide Housing Opportunity Plan (AHOP) program.

How the Program Works

The Capitol Region Council of Governments allocated 50 Bonus Section 8 Existing certificates to four participating jurisdictions in the Hartford metropolitan area. The certificates were allocated to local housing authorities with the condition that they be used for households on their current waiting lists who are not presently residing in the town. The housing authorities may give priority to households on their waiting lists who are not currently residing in the town but who are employed there.

A household applying for a Section 8 Existing certificate under

this program must apply to the housing authority in the town to which they wish to move. The receiving housing authority checks with CRCOG for address location. CRCOG makes use of a DIME system (a 1975 computerized study of all addresses in the metropolitan region) which they utilize to determine the location of the address. This system ensures that the households participating in the program are making interjurisdictional moves and it allows them to give priority to households moving from central city locations to suburban locations.

The administrative funds available through the Section 8 Existing program have covered all of the program's administrative costs. However, CRCOG has used AHOP "701" funds to develop and administer the other supportive services associated with this program, which CRCOG terms the Fair Housing/Housing Services Program.

Through this program, the Capitol Region Council of Governments provides a variety of services including the following:

- A 24-hour phone line to provide assistance in resolving all types of housing problems including locating subsidized and unsubsidized housing and information on towns participating in the Section 8 housing program.
- Notification of rent-up of new government assisted housing developments, provided in quarterly vacancy reports and over the phone. Because of the extremely low vacancy rates, information on waiting lists of less than one year is also provided. This information is distributed to all local housing authorities, human services agencies, and other agencies which provide housing services.
- Development and distribution of a map of the Capitol region identifying the locations of major employers, government assisted housing, and bus routes.
- Distribution of bilingual publications on government assisted housing, private market rentals, and the Section 8 program.
- Publication of "Shopping for Section 8", a booklet providing information on the towns participating in the Section 8 program.
- Workshops for the use of local housing authorities which teach certificate holders how to find an apartment.
- Workshops for landlords explaining the Section 8 program. Advertisements placed in town newspapers provide information to landlords and encourage them to participate in the Section 8

program. Workshops are also conducted on home ownership and on purchasing condominiums.

- The transfer of Section 8 certificates by CRCOG from one jurisdiction to another. This is a rare occurrence and some jurisdictions are hesitant to permit the transfer because they lose the certificate.
- An analysis of the extent to which affirmative marketing goals are achieved as well as a report, recently completed, explaining affirmative marketing plans and requirements.

Evaluation

All of the 50 Section 8 Existing certificates have been issued. CRCOG feels they could have used more certificates within the program; however, they have not received any additional bonus existing certificates.

At the outset of the program, the jurisdictions were afraid to participate in the program because of their own long waiting lists. An extensive amount of education and persuasion was necessary to get the program underway. Now additional towns have expressed an interest in joining the program.

Particular problems are faced by households needing larger units, because it has been extremely difficult to find vacant units of sufficient size within the fair market rents.

METROPOLITAN AREA PLANNING COUNCIL
BOSTON, MASSACHUSETTS

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The Agency and its Region

The Boston metropolitan area contains approximately 100 cities and towns in addition to Boston itself. There are four operating Section 8 programs in the region which allow some mobility to recipients. Only the interjurisdictional program referred to as the Section 8 Administrators Association is discussed here; others are discussed in different sections of this study.* This program is both unique and unusual because of the strong initiating position of the Boston HUD Area Office.

The Boston SMSA has a population of approximately 2.8 million, of which just over 10% is minority. In 1970 about 63% of all housing units were located in buildings of two or more dwellings, and about 40% of households were renters.

The Program in Brief

Participating public housing authorities in the Boston metropolitan area, as well as outside of the region, have agreed to reserve at least a portion of their Section 8 certificates for use by eligible households wishing to move to another participating jurisdiction. The program began with Fiscal Year 1980 allocations and is still operating, under a requirement issued by the Boston HUD Area Office.

How the Program Works

The interjurisdictional housing program in the Boston metropolitan area referred to as the Section 8 Administrators Association mobility program is operating under a directive issued by the Boston HUD Area Office on July 6, 1981, which reads:

*See "Miscellaneous" Chapter.

In order to assist your authority in the administration of the Section 8 Mobility Program, we are writing to review the requirement that a minimum number of certificates be made mobile.

Housing authorities participating in the Section 8 Administrators' Association mobility program are required to make their entire Fiscal Year 1982 allocation, or twenty percent of their total allocation (whichever is less), mobile. This twenty percent figure is a minimum; participating housing authorities may make their entire FY82 allocation (as well as older certificates which are reissued as a result of dropouts) mobile, and are encouraged to do so in order to provide their recipients with the greatest chance of finding an eligible apartment and achieving their preferences.

Housing authorities which did not receive an allocation in Fiscal Year 1982 are not required to make certificates mobile, but may choose to do so from previous allocations as certificates are reissued to new recipients.

The program has been in operation since Fiscal Year 1980 and approximately 80 jurisdictions are participating, of which 8 are outside of the Boston metropolitan region.

Participating public housing authorities reserve twenty percent or more of their Section 8 certificates to be used by eligible households who wish to move to another participating jurisdiction. Participating public housing authorities agree to accept each other's certificates. The original or "issuing" housing authority retains the certificate and continues to receive the HUD payments. The receiving or "host" housing authority requisitions the issuing housing authority and makes payments to the owner.

The host housing authority is responsible for:

lease approval and housing assistance
payments contract execution,

payments to owners,

information and assistance to
participating households,

review of family circumstances, rents
utilities and housing quality,

termination and family moves, and

complaints and appeals.

The issuing housing authority receives 90% of the preliminary fee and the host housing authority receives the remaining 10%. However, of the ongoing administration fees, the division favors the host housing authority. For instance, for a two bedroom apartment, the administrative fee is 8-1/2 % of the fair market rent. The issuing housing authority receives 1.5% of the 8-1/2% and the host housing authority receives 7.0% of the 8-1/2%,

The housing authorities participating in the Section 8 Administration Association mobility program are to give certificate holders a list of all housing authorities participating in the mobility program together with the names and telephones of contact persons for each of those agencies. This list is provided to them by the Boston HUD Area Office. These lists are made available during the initial briefing session with the household. Participating authorities also advise certificate holders that information relative to market rents, availability of apartments, neighborhoods, transportation, and other information for each community, will be available at the housing authorities listed.

To assist in these activities, the Metropolitan Area Planning Council prepared Community Information Sheets for each of the participating jurisdictions. There is also a Community Information Manual, prepared by MAPC, with information on all communities in the Boston metropolitan area and a brochure, entitled, "Where in the Region Would You Like to Live?" which participating housing authorities provide certificate holders.

Finally, participating housing authorities inform certificate holders of any special programs which would help households in their move to other jurisdictions and identify any agencies which offer information and referral services in the area.

Evaluation

MAPC conducted an evaluation of the status of Section 8 certificates issued by housing authorities participating in the Section 8 Administrators Association mobility program between August 1980 and December 1980.

Of the 306 certificates issued, 14% stayed in place, 13% moved to a different apartment in the same jurisdiction, 6% moved to a different jurisdiction, 33% were still looking at the time of this evaluation, and 33% returned their certificates. If percentages are calculated only on those who were successful at leasing, the following results were obtained: 42% stayed in place, 39% moved to a different apartment in the same jurisdiction, and 19% moved to a different jurisdiction.

Of those certificate holders who moved to a different jurisdiction, 10% moved to a jurisdiction with relatively fewer proportions of minority and lower income households, 5% moved to a jurisdiction with approximately the same but high proportions of minority and lower income households, 40% moved to a jurisdiction with relatively higher proportions of minority and lower income households, and 45% moved to a jurisdiction with approximately the same but low proportions of minority and lower income households.

The Metropolitan Area Planning Council and the Boston HUD Area Office consider the program an important contribution to meeting the objectives of allowing eligible households to achieve housing preferences within the Boston metropolitan region and intend to continue the program.

NORTH CENTRAL TEXAS COUNCIL OF GOVERNMENTS
ARLINGTON, TEXAS

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The Agency and Its Region

The North Central Council of Governments is a voluntary organization covering 16 counties, including the cities of Dallas and Fort Worth. There are 185 participating local governments, counties, municipalities, and special district members throughout its region of 12,627 square miles. Approximately 3.2 million people live in this region, which is primarily urban, although rural areas remain. About 40% of the population in central cities is minority. Between 1970 and 1981, the number of people employed in this region grew by 63%.

The Program in Brief

Public housing authorities and housing assistance programs, representing seven jurisdictions, have committed a total of 66 Section 8 Existing certificates to an interjurisdictional program. It began on December 1, 1980 and the first phase continued to September 30, 1981, at which time it was anticipated the program would be continued until May 31, 1982. The program was initiated and received funds from the Regional Housing Mobility Program.

How the Program Works

During the first phase, the following jurisdictions agreed to reserve Section 8 Existing certificates for an interjurisdictional program:

| | |
|----------------|-----------------|
| Dallas | 30 certificates |
| Fort Worth | 12 certificates |
| Arlington | 10 certificates |
| Grand Prairie | 6 certificates |
| Tarrant County | 5 certificates |
| Garland | 2 certificates |
| Lancaster | 1 certificate |

The certificates are reserved for any eligible household that desires to move into that jurisdiction from another jurisdiction in the region. The identification of those households interested in making an interjurisdictional move takes place during the normal

application/certification process for the Section 8 Existing program.

The agency in the jurisdiction where the household presently lives verifies the eligibility of the household and contacts the agency in the jurisdiction where the household wishes to move. Preliminary approval is obtained based on the availability of an appropriate certificate within the reserved number of certificates committed by that jurisdiction.

The originating jurisdiction sends the completed file, along with a letter verifying certification eligibility of the household, to the receiving jurisdiction. The household is briefed by the agency in the receiving jurisdiction, may be subject to eligibility verification again, and is issued a certificate by the receiving jurisdiction.

There is a Regional Housing Mobility Committee which consists of representatives from the Fort Worth Housing Authority, the City of Garland, Tarrant County, the Arlington Housing Authority, the Grand Prairie Committee Renewal Agency, the City of Lancaster, the Fort Worth Human Relations Commissions, the Dallas Housing Authority, The City of Mesquite, and the Greater Dallas Housing Opportunity Center. This committee monitors the interjurisdictional program by reviewing monthly reports from the participating jurisdictions identifying any interjurisdictional moves that have taken place

Other support activities that have occurred is the publication of "Federally Assisted Housing Opportunities for Low Income Persons in North Central Texas" which is the result of a regional clearinghouse of information on lower cost housing. Landlord outreach activities were conducted to increase the stock of housing available to the Section 8 Existing housing program. These activities included the development of a Landlord Advisory Committee and Landlord Workshops. NCTCOG helped the City of Dallas to implement a workshop on community based housing. Since the workshop, a community development corporation has been chartered by the State of Texas. A steering committee was formed, including representatives of the city, lenders, developers, academicians, community leaders, and NCTCOG staff.

Evaluation

Limitations on the available housing stock is perhaps the most difficult barrier to the interjurisdictional program. There is very little Section 8 housing outside of the central cities in this region. Many local governments in the area do not participate in the Community Development Block Grant program or in assisted housing programs. Most of the housing starts in the region are for higher income households.

Existing waiting lists in the central cities are very long. Households not desiring to participate in the interjurisdictional program can circumvent the program by signing up for a certificate in a suburban area and then seeking a transfer to the city where they presently live.

There are not very many counseling agencies in the region to assist households with housing problems.

A regional waiting list or a regional housing authority has been suggested as a more practical approach for this region. Moreover, because of the shortage of assisted housing, the Council of Governments is exploring ways to get the public and private sectors to cooperate in expanding housing opportunities.

The program was ended in May 1982. NCTCOG has shifted its focus away from the interjurisdictional activity to concentrate on alternative tenure and management structures and community based initiatives.

In a Section 8 Client Assessment, a majority of the respondents to a written questionnaire did not want interjurisdictional mobility. Thirteen percent wanted intrajurisdictional mobility. Sixty-nine percent of the respondents wanted more affordable housing. The reason given most often for preferring to live in a particular city was the need to live near relatives. Employment, better schools, and better job opportunities were the next most frequently cited reasons. Another finding was that seventy percent of those surveyed were female heads of households. As a result of the survey, program emphasis was given to increasing the financial independence of female heads of households, by coordinating the location of housing with affordable support services and job opportunities.

The Interjurisdictional Section 8 Certificate Exchange program was a ten month demonstration. Between December 1, 1980 and September 30, 1981, a total of seventeen "mobility transfers" were recorded, out of a possible sixty-six available certificates. NCTCOG reports that based on demand, the program could have been extended; however, an insufficient number of requests for mobility were received to justify continuation of the certificate exchange.

EXCHANGE OR TRANSFER OF CERTIFICATES

THE MECHANISM IN BRIEF

This mechanism calls for jurisdictions to agree to allow for the exchange or transfer of certificates between administering agencies. Because the Section 8 Existing housing program is most often administered through local housing authorities with designated jurisdictional boundaries, these agreements allow eligible households to move to a different jurisdiction without the threat of losing their certificates.

Interjurisdictional moves are permitted through this mechanism only to the extent that cooperating jurisdictions agree and to the extent that certificates are available in the receiving jurisdiction. In some instances, jurisdictions agree to an exchange or transfer where possible for all eligible households desiring to move. In other instances, the agreement specifies a certain number of certificates that will be made available for such exchanges or transfers or establishes a maximum not to be exceeded.

HOW THE MECHANISM WORKS

The exchange or transfer of certificates allows a household to apply for a certificate while living in one jurisdiction and then move to a different jurisdiction. The administering agencies agree to undertake the necessary paperwork so that the allocation of certificates is undisturbed, reporting requirements to HUD are carried out, and administrative funds and tasks fairly shared.

This mechanism requires that administering agencies reach an agreement with other participating jurisdictions to exchange one of their certificates for a certificate issued to an eligible household from another jurisdiction. Exchange is not precisely the correct term, for the receiving agency actually issues one of its own certificates to the household moving from another jurisdiction. The certificate they were already issued is returned to the original jurisdiction.

The most significant variation within exchange or transfer programs is whether the participating jurisdictions commit only a certain proportion or number of their available certificates for exchange or whether the exchange of certificates that can take place is unrestricted and limited only by the availability of those certificates. Placing a limit or maximum on the number of exchanges

that can take place between participating jurisdictions is the much more common type of exchange program. This is generally true because of the political repercussions of using available certificates to assist households from other jurisdictions.

ADMINISTRATION

Exchange or transfer programs vary with regard to certain administrative responsibilities, one of the most important of which is the notification process. In some programs, an eligible household applies to the receiving housing authority, which, in turn, notifies the original authority that it has issued an exchange certificate. The Chicago program is administered in this way.

Alternatively, the eligible household can request an exchange certificate from the original housing authority, which then notifies the receiving authority. The Twin Cities program is administered this way. In the program within the New Orleans region, the original housing authority refers the eligible household to the receiving authority.

In all instances, if the household locates a suitable unit, the original certificate is returned to the issuing housing authority. The receiving housing authority then administers the exchange certificate just as it administers any of its certificates. If the household is unable to locate a suitable unit, the original certificate is returned to the household and the receiving housing authority takes back its exchange certificate.

A second source of variation within this mechanism is how the waiting lists of the participating housing authorities are treated. Probably the most common procedure is for an eligible household to advance on the waiting list of the authority in the jurisdiction where the household presently lives. When the household receives an available certificate from its own authority, it then requests an exchange certificate from another housing authority. The receiving agency will then issue the exchange certificate if the household meets all requirements, if a certificate is available, and if (where applicable) the agreed upon number of exchange certificates has not been exceeded.

When the exchange certificate is issued, the eligible household usually advances to the top of the waiting list in the receiving jurisdiction. Thus, the household must advance on the original waiting list as all households do, but in the receiving jurisdiction can jump the waiting list when it receives the exchange certificate.

An alternative to this pattern is that the eligible household seeking an exchange certificate must go to the bottom of the waiting list in the jurisdiction to which it has selected to move, regardless of its status on the original waiting list. The program in the New Orleans region is described in this way; however, the New Orleans program also permits a household to be on multiple waiting lists at the same time.

In virtually all exchange or transfer programs, a household must meet all of the requirements that exist for the jurisdiction to which it has selected to move. Thus, if the income requirements or the fair market rents should differ, the household would have to meet the requirements of the receiving housing authority.

In no instance is there an exchange of administrative start-up fees in these programs, probably because all participating housing authorities are responsible for the same amount of initial administrative work. Administrative agreements generally identify how the exchange will take place, when it will occur, and what information should be transferred between participating authorities. Such information usually includes an identification of the household making the exchange, its bedroom requirements, and its annual income. In virtually all instances, the receiving jurisdiction verifies eligibility on its own, even if the original jurisdiction has already done so. Also, in all instances, participating housing authorities can withdraw from the program by giving adequate notice to the other participating jurisdictions.

COUNSELING AND OUTREACH

The operation of an exchange or transfer program requires that all participating housing authorities agree to inform eligible households, usually during the briefing sessions, that it is possible for them to request an exchange certificate and look for a suitable housing unit in any of the other participating jurisdictions. This same information may be provided at the annual re-examination of tenants for continued eligibility.

Beyond this basic requirement, the degree of counseling and information provided varies and generally seems of modest amounts. Most common is to provide information about the participating jurisdictions, such as vacancies, lists of participating landlords, etc.

Often, in these programs, the regional agency or council of governments prepares this information and makes it available to the participating agencies. The regional agencies also usually perform some coordinative and monitoring role.

PROS AND CONS

Exchange or transfer programs require very little additional administrative work on the part of participating housing authorities. They must carry out the additional briefings necessary to inform eligible households that they may move to another jurisdiction. In addition, authorities must carry out the notification procedures required and be able and willing to do the additional bookkeeping and reporting necessary to handle exchange certificates. No participating agency either gains or loses its allocated number of certificates, because the exchange neither can nor does occur unless a certificate is available in the receiving jurisdiction. Where participating jurisdictions have agreed only to make available a certain proportion or number of certificates for the exchange program, those housing authorities must keep track of the use and availability of these certificates. These additional requirements are minimal, however, because the housing authority is basically issuing one of its own certificates and administering it as such.

In the limited-exchange jurisdiction, as is true for the reservation or set-aside of certificates, there is an established limit to the amount of mobility that can occur through the program because the number of available certificates for exchange is limited.

EXCHANGE OR TRANSFER OF CERTIFICATES PROGRAMS

Imperial Valley Coordinated Housing Authority
 Bernardino County, California
 Orange County, California
 Detail not available.

*Leadership Council for Metropolitan Open Communities
 Chicago, Illinois
 agreement to exchange 5% of Section 8 certificates by
 eight public housing authorities.

Houston-Galveston Area Council
 Houston, Texas
 unrestricted exchange agreement, depending upon
 availability of certificates, by seven jurisdictions.

*Metropolitan Council
 St. Paul, Minnesota
 agreement to exchange 5% of ACC authority by five public
 housing authorities.

*Regional Planning Commission
 New Orleans, Louisiana
 agreement to exchange no more than 10% of Section 8
 certificates by three public housing authorities.

Tampa Bay Regional Planning Council
 St. Petersburg, Florida
 exchange agreement for 4 units from each jurisdiction
 between a county and city and between two cities.

West Texas Council of Governments
 El Paso, Texas
 second agreement in this region allows for exchange of a
 set number of certificates among 4 jurisdictions.

*Case study in this chapter.

LEADERSHIP COUNCIL FOR METROPOLITAN OPEN COMMUNITIES
CHICAGO, ILLINOIS

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The Agency and its Region

The Leadership Council for Metropolitan Open Communities is a non profit public interest organization involved in civil rights and housing issues within the Chicago metropolitan area. The Leadership Council acts as program coordinator for the Section 8 Certificate Exchange Program (CEP) in the Chicago metropolitan area.

The Section 8 Certificate Exchange Program covers 90% of the Chicago metropolitan area population of 7,000,000. Eight public housing authorities participate in the program. They are the housing authorities for Chicago, Cook County, DuPage County, Elgin, Lake County, McHenry County, North Chicago, and Waukegan.

The region covered by the program is largely urban, although there are rural areas in some of the outlying counties. The Chicago metropolitan area population contains approximately 20% Black population out of a total of over 7 million in 1980. In the Chicago SMSA in 1970, just over 50% of housing units were located in buildings with 2 or more units, and about 45% of households were renters.

The Program in Brief

The eight public housing authorities participating in the Section 8 Certificate Exchange Program in the Chicago metropolitan area have agreed to make a percentage of their non-elderly Section 8 certificates available to households carrying a certificate issued by another participating housing authority. Certificates of participation are exchanged between the housing authorities. No funds or responsibilities are exchanged or shared.

How the Program Works

The Section 8 Certificate Exchange Program was initiated by eight housing authorities in the Chicago metropolitan area on October 1, 1979. The Leadership Council for Metropolitan Open Communities acts as program coordinator.

The program broadens the geographic area in which eligible households living in the jurisdiction of a participating housing authority may look for housing. It provides the opportunity for eligible households to move within any of the eight participating jurisdictions.

Each participating public housing authority has agreed to provide at least 5% of its non-elderly certificates to the Certificate Exchange Program, allocated each year on a cumulative basis, starting with Fiscal Year 1979. The public housing authority agrees to issue its own next available certificate in exchange for a certificate from another participating authority.

Each household receiving a certificate from a participating housing authority is advised at the briefing session that, on a first come, first served basis, certificates can be exchanged for a certificate from another participating housing authority provided that the criteria established by the receiving housing authority are met.

When the receiving housing authority issues its certificate to an eligible household intending to move from another jurisdiction, the original housing authority is notified. If a unit is found, and a lease and HAP contract executed by the receiving housing authority, the original certificate is returned to the original housing authority for re-issuance. If a unit is not found in the new jurisdiction, the original certificate is returned to the applicant and the exchange certificate is cancelled.

There are no transfers of start-up or management fees between the participating housing authorities. Each continues to operate its own program and carry out its own responsibilities. No housing authority gains or loses any units as a result of participating in the Certificate Exchange Program. To increase the total number of certificates available for the program, each participating housing authority has agreed to make one more certificate available to the exchange program as each lease expires that has resulted from a certificate exchange. Any housing authority may withdraw from the program upon 60 days notice.

Each participating housing authority keeps its own waiting list. There is, however, no waiting list for the Certificate Exchange Program. A household advancing on the originating housing authority's waiting list, wishing to exchange a certificate, immediately receives the next available certificate, if it is available and if the household meets all the necessary requirements.

The Leadership Council for Metropolitan Open Communities, at the pleasure of the participating housing authorities, acts as the coordinator of the Certificate Exchange Program. The Leadership Council receives copies of information regarding all certificate exchanges, keeps records, convenes monthly meetings of the participants and prepares monthly and annual reports on activities under the program.

No formal counseling is provided especially for the Certificate Exchange Program. Counseling and assistance is provided by each housing authority on a request basis. Assistance provided varies by each housing authority.

No household may obtain a certificate from another housing authority and exchange it for a certificate from the housing authority covering the jurisdiction in which the family currently resides. The receiving housing authority advises each applicant that the family is liable for all unpaid rent and damage claims made by previous Section 8 landlords and that leases will not be renewed if substantial claims are not satisfied.

The Certificate Exchange Program has not served elderly certificate holders during its first two years. It is the intent to do so when and if HUD makes a significant allocation of Section 8 elderly certificates to the participating housing authorities. Virtually all Section 8 allocations in the area during the last two years have been for non-elderly families.

Evaluation

Between October 1, 1979 and September 30, 1981, 141 families used the Certificate Exchange Program to move from one jurisdiction to another. The numbers were almost identical each year, 70 during the first year and 71 during the second year.

During this period, 284 certificates were exchanged, and almost 50% of the exchanges resulted in leases. This is a high percentage compared to those families seeking to move from one unit to another within the same jurisdiction. The probable reason for this is that many families do not bother to exchange their certificate until they are quite sure of obtaining a unit in another jurisdiction.

While all eight participating housing authorities have used the program, the following figures indicate the nature of the largest number of moves:

| | |
|----|--|
| 32 | Chicago to suburban Cook County |
| 21 | suburban Cook County to Chicago |
| 18 | DuPage County to suburban Cook County |
| 15 | Waukegan to suburban Lake County |
| 9 | suburban to Cook County to DuPage County |
| 7 | Elgin to suburban Cook County |

Racial statistics are available for 136 of the 141 moves made under the program. Of these families, 94 (69%) were Black, 38 (28%) were white, 3 (2%) were Hispanic, and 1 (1%) was Asian. Of the Black families, 67 moved to suburban jurisdictions. And of these, 38 (57%) moved to communities with less than 5% Black population, 23 (34%) moved to communities with 5-25% Black population, and 5 (9%) moved to communities with more than 50% Black population. At the same time, 18 Black families used the program to move from suburban areas into Chicago.

METROPOLITAN COUNCIL
ST. PAUL, MINNESOTA

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The Agency and its Region

Minnesota state legislation has given power to the Metropolitan Council to operate housing programs and to operate as the Metropolitan Council Housing and Redevelopment Authority.

The Metropolitan Council has jurisdiction over the Twin Cities region which includes nine counties and 57 suburban jurisdictions in addition to the Twin Cities. The Authority operates through agreements with nine housing authorities existing throughout the region.

The Metropolitan Council Housing and Redevelopment Authority operates a Certificate Exchange Program with four of the housing authorities. These are the housing authorities of St. Paul, Dakota, Plymouth and Scott counties, and the Metropolitan Area HRA covering the suburban areas of the Twin Cities.

The region covered by the Minneapolis-St. Paul SMSA includes a population of over 2 million in 1980, 95% of which is white. Between 1970 and 1980, the number of housing units in the region increased from nearly 600,000 to approximately 800,000. In 1970, about 35% of the units were located in buildings of 2 or more units, and about the same percent of households were renters.

The Program in Brief

The four housing authorities participate in a Certificate Exchange program involving a commitment of 5 percent of each of their annual contribution contracts. The agreement among the housing authorities allows eligible households to exchange certificates when they move from one jurisdiction to another through the participating housing authorities.

How the Program Works

The Memorandum of Agreement was executed on September 4, 1979

by the four housing authorities. Each authority agreed to use 5% of its ACC authority for the Certificate Exchange Program. A total of 287 certificates were set aside.

Under the agreement, eligible Section 8 households are allowed to transfer to another participating jurisdiction on a first-come first-served, basis, provided that:

- a certificate is available to accommodate the family's size.
- the participant meets the eligibility criteria of the PHA to which the transfer is requested.
- the participant did not reside within the jurisdiction of that PHA at the time of original program certification.
- the participant has located a qualifying rental unit prior to receiving the exchange certificate.

The following procedure is generally followed:

1. Each signatory to the agreement sets aside 5% of its ACC authority each year beginning on September 1, 1980 from the Section 8 Existing housing program. The program operated on a trial basis from September 1979 through August 1980.

2. A household with a valid Section 8 Certificate from a participating PHA may request an exchange of certificates if the family wants to move to a jurisdiction within another participating PHA.

3. Upon receiving the request for an exchange certificate from an eligible household, the original PHA gives notice to the potential receiving PHA of the request. The request contains the name of the family, the number of bedrooms required, and the gross family contribution. The original PHA keeps the original certificate and directs the household to the receiving PHA to receive a new certificate. The original PHA records the exchange and makes the original certificate available for re-issue.

4. When the receiving PHA receives the request for an exchange certificate from the original PHA, it will issue a new certificate to the eligible household, if a certificate is available and if the maximum number of certificates set aside has not been exceeded. Those households receiving an exchange certificate are treated on a first come first served basis, after which the receiving PHA serves its regular waiting list.

Participating PHA's may withdraw from the agreement and

terminate their participation by giving sixty (60) days written notice to all other participating PHA's.

No special counseling is provided for families who choose to exchange certificates. There is no assistance program to provide households with help in finding new housing in another jurisdiction. However, all participating PHA's provide information about the exchange program during the briefing sessions and at the annual re-examination of tenants for continued eligibility. Participating PHA's do provide information on housing vacancies to other PHA's in the program. In addition, the Metropolitan Council Relocation Clearinghouse provides all participating PHA's with vacancy and resource information. Participating PHA's also frequently exchange information and evaluations with each other.

Evaluation

During the first experimental year of the program, the greatest number of participants moved from jurisdictions covered by the Metropolitan HRA into the St. Paul HRA. The second highest number of participants did the reverse; that is, they moved from St. Paul to jurisdictions covered by the Metropolitan HRA.

The Metropolitan Council conducted a mail survey to selected participants in the program to assess how they found out about the program, household characteristics, and satisfaction with their new residence. Early results (with only 38 responses) indicate that most participants were already on a waiting list but found out about the program through other means: the program flyer from HRA, friends or relatives, or through welfare or social service agencies.

Most participating households who responded have children. And most of them moved to find better housing and lower rents and they tend to like their new environments. Several families indicated they were having trouble with transportation, although most were not or did not indicate that they were. Many families desired more information about services available near their new homes, but only six of the respondents felt they needed more counseling than they received. A large majority of the respondents liked their new home better than their last.

REGIONAL PLANNING COMMISSION
NEW ORLEANS, LOUISIANA

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The Agency and its Region

The Regional Planning Commission is an advisory commission begun in 1969. It covers four parishes in the state of Louisiana: Orleans, Jefferson, St. Bernard, and St. Tammany, all within the New Orleans SMSA.

Orleans Parish is coterminous with New Orleans; Jefferson and St. Tammany Parishes are suburban communities, and St. Bernard Parish contains large amounts of undeveloped land.

The region included within the New Orleans SMSA contains a population in 1980 of nearly 1.2 million, of which about 33% is Black. In 1970, approximately 40% of housing units within the SMSA were located in buildings of 2 or more units, and about 45% of households were renters. From 1970 to 1980, the number of housing units in the region increased about 30%.

The Program in Brief

A Certificate of Exchange Agreement allows for each participating PHA to agree that 10 percent of all its Section 8 certificates will be eligible for an exchange program.

The Regional Planning Commission, as part of its participation in the Regional Housing Mobility Program, began the exchange agreement. It has been signed by the PHA's from the City of Kenner, St. Bernard Parish, and the City of Westwego. It is also being considered by the PHA's of the City of New Orleans, the City of Slidell and St. Tammany Parish.

How the Program Works

Each participating public housing authority agrees to recognize a Section 8 certificate issued by another participating

housing authority and to exchange that certificate for one of their own if a vacancy exists. The agreement adds that in no event and at no time will more than 10 percent of the total units in each jurisdiction be allocated to or occupied by persons with certificates from another PHA.

Eligible households wishing to move to another participating jurisdiction are referred to the receiving PHA. That PHA is responsible for all of the Section 8 administration and uses their own Section 8 administrative funds. The receiving PHA returns one of its own certificates to the original PHA.

Any participating PHA may withdraw from the agreement by giving 30 days written notice to the other PHA's. None of the PHA's have residency requirements but preferences are given to residents of their own jurisdictions.

The exchange program is advertised through the minority media channels, such as Black and Hispanic radio stations and newspapers. The Regional Planning Commission publishes a newsletter monthly that lists occupancy and vacancy information for housing authorities and instructs households how to sign up for those vacancies.

All counseling is conducted by the Regional Planning Commission. Counseling consists primarily of answering questions over a telephone hot line. Questions usually concern location of housing, requirements for income and family size, and vacancies. Households can also go to or ask the PHA's for information about vacancies. There are not, however, any sub-contracts specifically for the purposes of counseling.

The Regional Planning Council held a one-day training session for the Urban League and neighborhood agencies to explain activities of the Commission and the exchange program. The session's main focus was on the Black neighborhoods and their reaction to the exchange program.

The Regional Planning Council also works directly with the public housing authorities. They hold monthly meetings, which serve as a means of exchanging information about vacancies. Quarterly meetings are also held to exchange information and statistics about the program.

Waiting lists are kept by each housing authority. It is possible for a household to be on as many waiting lists as they wish at the same time. When a household wants to move into a

different jurisdiction, however, they must go to the bottom of that PHA's waiting list.

Evaluation

The Regional Planning Commission had difficulty getting this program underway. The PHA's with the greatest number of certificates were most reluctant to participate. Most PHA's in the region prefer to house their own residents and did not want to participate. There was also some opposition to the exchange program from residents in New Orleans who wanted to stay within the parish. The Commission failed to get much support from local media, particularly for public service announcements. The lack of new housing construction also makes the program difficult to administer.

With the expiration of the Regional Housing Mobility Program, the Regional Planning Commission will look for other sources of funds. While the telephone hot line will probably have to be cancelled, they intend to maintain the newsletter. They intend to seek assistance from the state.

The Commission reported that over 18,000 households are on waiting lists for public housing. They counseled some 900 families in 1980 in search of housing. The vast majority of these were minority households.

AGREEMENTS TO HONOR CERTIFICATES

THE MECHANISM IN BRIEF

This mechanism results from jurisdictions agreeing between or among themselves to honor the certificates issued by another of the participating jurisdictions. It allows eligible households who have received Section 8 Existing certificates to look for housing in any of the participating jurisdictions, even though they have received a certificate from another. The agreement also allows that household to retain the certificate and receive benefits from the program even after they are living in a qualifying housing unit in a jurisdiction other than the one issuing the certificate.

Through this mechanism, certificates are not transferred or exchanged between administering agencies. Administrative responsibilities for the program are usually shared between the participating agencies and the division of responsibilities is spelled out in the agreement.

HOW THE MECHANISM WORKS

In order for this mechanism to operate, the participating jurisdictions agree to honor the certificates issued to eligible households from other jurisdictions. "Honoring" implies that the household may look for a qualifying unit in any of the participating jurisdictions regardless of where its certificate was issued. Upon finding a qualifying unit, the household notifies the appropriate housing authority, and the participating agencies then carry out their agreed upon division of responsibilities.

The Hartford region represents an example where more restrictions are placed on the eligible household. Before they are permitted to look for a housing unit in another jurisdiction included in the agreement, they must be able to indicate the difficulty they have had in trying to find a unit in the jurisdiction where they presently live and were issued the certificate.

ADMINISTRATION

Agreeing to honor the certificate of other participating jurisdictions is often described as the simplest of the mechanisms to allow for mobility among jurisdictions by eligible households. And, indeed, this may be true, because the certificate always stays with the issuing or original housing authority, regardless of where the

eligible household selects to move. As a result, the reporting requirements to HUD are the simplest, since no movement of certificates occurs. However, it must be decided which housing authority receives credit for the household that moves, and these programs are not consistent in whether that credit is given to the issuing authority or the receiving authority. Usually, the housing authority which has agreed to the greatest amount of on-going responsibility in the agreement is given credit on its HAP for the certificate use. However, in some programs this credit is given to the originating housing authority and in others it is given to the receiving housing authority.

In fact, the agreements to honor the certificates of other participating jurisdictions require more administrative definition than any of the other mechanisms. Participating housing authorities must identify which housing authority is responsible for each administrative task when a household selects to move to another jurisdiction. And any individual housing authority will have one set of administrative responsibilities for those certificates it has issued and a second set of responsibilities for those certificates it has agreed to honor from other jurisdictions.

It is in the administration of the agreements to honor the certificates of other participating jurisdictions, therefore, that the detail of this mechanism becomes important. It is difficult, if not impractical, for a housing authority to carry out all of its administrative responsibilities within the Section 8 Existing housing program, when the eligible household has selected to move to another jurisdiction that may be some distance from the original housing authority and clearly outside the boundaries of its own jurisdiction. For this reason, the division of administrative responsibilities generally follows the location of the task. That is, the original housing authority will retain responsibility for verifying eligibility and all of the initial briefing and intake responsibilities. This will also include executing the housing assistance payments contracts and making payments to the landlord. This housing authority will also undertake recertification activities.

The receiving authority generally will be responsible for inspecting the housing unit selected by the household and assisting the original housing authority with any landlord or tenant problems, if requested.

Along with the division of administrative responsibilities, participating housing authorities may share administrative fees in accordance with the division of responsibilities. Thus, the authority receiving the administrative fees associated with administering the certificate may share those dollars, almost in the sense of a sub-contract, with the receiving housing authority

which has agreed to honor the certificate. In reference to the case studies presented at the end of this chapter, the agreement associated with the West Texas Council of Governments is probably most typical of the arrangements reached.

In some instances, the regional agency or council of governments plays a coordinative role and assists in the communication between participating housing authorities. These agencies may also assist in tracking and/monitoring activities.

COUNSELING AND OUTREACH

Eligible households must be informed, usually during the briefing sessions, that their certificate will, under most circumstances, be honored in any of the other participating jurisdictions. The households are then permitted to search for housing in any of these locations.

As with the other mechanisms, agencies vary with respect to the amount of information made available to eligible households to assist them in their search for housing in other participating jurisdictions. Sometimes households are able to work with local organizations in various jurisdictions or they receive information from the regional agency or council of governments about the various participating jurisdictions.

PROS AND CONS

Some agencies feel this mechanism is the easiest to sell politically because it appears to be a simple agreement and the jurisdiction is not using its certificates to serve "outsiders". It is also true that this mechanism requires little additional paperwork within the Section 8 Existing housing program, although complicated administrative arrangements are required among agencies.

One difficulty in agreements to honor certificates, however, is that unless the participating jurisdictions have similar requirements, an eligible household might need to meet the income eligibility requirements of one jurisdiction but have the housing unit qualify under the requirements of a separate jurisdiction.

Perhaps the greatest advantage of this mechanism is that it appears to be a relatively acceptable means for getting around or modifying residency preferences that still exist within many jurisdictions. These preferences restrict the beneficiaries of

their certificate program to residents or, under some arrangements, to households working but not living within the jurisdiction. Under certain circumstances, the agreement to honor the certificates of other participating jurisdictions may be the only type of agreement that can be reached.

AGREEMENTS TO HONOR CERTIFICATES PROGRAMS

Association of Bay Area Governments
Berkeley, California

Three counties (Alameda, Santa Clara and Contra Costa) and the City of Berkeley honor each other's certificates. 5000 certificates involved, but few interjurisdictional moves.

*Capitol Region Council of Governments
Hartford, Connecticut

Four or five jurisdictions have agreed to honor each other's certificates.

Southern California Association of Governments
Los Angeles, California

Both Los Angeles County Housing Authority and Ventura County Housing Authority have agreements with other housing authorities to honor each other's certificates.

Westchester Residential Opportunities, Inc.
White Plains, New York

In the process of getting agreements from Yorktown, Yonkers, New Rochelle, and Nyack (outside of Westchester County) to honor each other's certificates.

*West Texas Council of Governments
El Paso, Texas

One of two interjurisdictional programs. This one is an agreement between the City of El Paso PHA and the Town of Anthony PHA to honor each other's certificates.

CAPITOL REGION COUNCIL OF GOVERNMENTS
HARTFORD, CONNECTICUT

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The Agency and its Region

The Capitol Region Council of Governments (CRCOG) consists of the City of Hartford and 28 suburban towns. There is no county government structure in Connecticut and, as a consequence, all planning and implementation decisions are made by local jurisdictions with the assistance of regional agencies.

The total population for the region is 668,479 and approximately 15% of that population is minority.

The Program in Brief

The Capitol Region Council of Governments is working with four or five jurisdictions to obtain agreements from their housing authorities. These agreements permit eligible households to move among the participating jurisdictions.

How the Program Works

The Housing Authorities of a few towns in the Hartford region have agreed to permit eligible households to move among the participating jurisdictions. The participating housing authorities honor the certificates issued from the other participating authorities.

Under the program, a household which has received a Section 8 certificate demonstrates that they cannot find a housing unit within the jurisdiction where they were issued the certificate. They indicate their desire to move to another jurisdiction. The housing authority in the jurisdiction from which they wish to move gives them the option to find another housing unit in any of the other participating jurisdictions. The local housing authority notifies the Capitol Region Council of Governments who then works with the local housing authorities involved.

The Council of Governments is responsible for making arrangements between the participating public housing authorities. CRCOG provides for HAP credit and determines which Housing authority will be responsible for the various program activities and responsibilities.

Certificates are not transferred between the housing authorities involved when a household makes a move to another jurisdiction. CRCOG stated that amending the Annual Contributions Contract (ACC) is too difficult and time consuming given the small number of Section 8 certificates that are involved as a result of households moving from one jurisdiction to another. As a consequence, the certificate stays with the original housing authority.

An additional requirement of the program is that an eligible household, using a certificate with permission to look for a housing unit outside of the issuing jurisdiction, cannot look for a unit within the City of Hartford. CRCOG determined that allowing these households to search within the City of Hartford would increase the difficulties that city residents already have in finding housing units qualifying for the Section 8 Existing housing program.

Evaluation

The Capitol Region Council of Governments believes this is a useful program and intends to continue in its efforts to obtain agreements from additional jurisdictions.

WEST TEXAS COUNCIL OF GOVERNMENTS
EL PASO, TEXAS

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West Texas Council of Governments
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The Agency and its Region

The West Texas Council of Governments is a voluntary association of local governments in El Paso County. El Paso is the principal city within a region covering 20,000 square miles. The City carries out an active annexation policy which has resulted in suburban-like areas being a part of the City rather than independent jurisdictions. The County is an SMSA (Standard Metropolitan Statistical Area). Mexican Americans are the largest minority within the region.

The West Texas Council of Governments is funded by HUD to operate a two-year \$75,000 Regional Housing Mobility Program. The program began on April 1, 1980. Two different interjurisdictional housing programs are operating within the region. One program allows for certificate exchange among the Public Housing Authorities of the Town of Anthony, the City of El Paso, and the County of El Paso. The second program is an agreement between the City of El Paso Public Housing Authority and the Town of Anthony Public Housing Authority. The second program is discussed here.

The Program in Brief

There exists a Memorandum of Understanding between the City of El Paso Public Housing Authority and the Town of Anthony Public Housing Authority. This Interjurisdictional Service Agreement allows households to move between the jurisdictions. The housing authorities advise certificate holders that they may look for housing in either jurisdiction. Moves are honored within the program when it will result in the household being closer to medical facilities, employment, or elderly relatives, in that order.

How the Program Works

For purposes of the Interjurisdictional Service Agreement, the public housing authority issuing the certificate is known as the

"Issuing PHA" and is responsible for the following:

- Taking the initial application from applicant households.
- Certification of the household for the Section 8 program.
- Issuing the certificate of participation.
- Reviewing and approving the request for a mobility move.
- Executing the Housing Assistance Payment Contract.
- Issuing the monthly housing allowance payments to the landlord.
- Establishing and maintaining landlord and tenant files.
- Responding to tenant and landlord complaints.
- Preparing and submitting reports to HUD.
- Providing necessary information about the eligible household and landlord to the "Host PHA".

The public housing authority of the jurisdiction to which the eligible household has selected to move is known as the "Host PHA". The responsibilities of the Host PHA include:

- Conducting the initial inspection of the housing unit identified by the eligible household and providing necessary information about the unit to the Issuing PHA.
- Conducting a briefing session for the new eligible household referred to them by the Issuing PHA.
- Conducting periodic inspections of the housing units as requested by the Issuing PHA and reporting findings to them.
- Assisting the Issuing PHA in responding to any landlord complaints.
- Assisting the Issuing PHA in other matters, as may be requested.

The West Texas Council of Governments has published a brochure and a housing counseling handbook. They also provide information and referral services. Support services are also provided by the CSA Neighborhood Centers and community groups within neighborhood centers, such as Project Bravo, League of United Latin America, Trinity Coalition, Southside Low Income Housing Coalition,

Neighborhood Veterans Outreach Program, and various community action groups.

Evaluation

The Council of Governments reports that there has not been much interjurisdictional movement within this program, because it is difficult for households to move and meet the criteria established for the program. Two moves have been reported to date.

There is, however, a lot of movement within the City of El Paso, and because of the annexation policy, this represents a substantial area. Outside of the City of El Paso, the region is largely rural and few housing units qualify for the Section 8 Existing Housing Program.

The West Texas Council of Governments believes this program will continue, regardless of the future of the Regional Housing Mobility Program. Each public housing authority is responsible for certain aspects of the program and they use their own contract authority and administrative fees to meet these responsibilities within the Interjurisdictional Service Agreement.

PROGRAMS ADMINISTERED OVER MORE THAN ONE JURISDICTION BY A CENTRAL AGENCY

THE MECHANISM IN BRIEF

In this mechanism, a group of interjurisdictional programs are run under the authority of a central agency receiving an allocation of Section 8 certificates directly from HUD. The agency can cover an entire state, a region made up of several counties, or a whole county.

These programs are almost always administered out of a central office if the jurisdiction is county-wide, but are sometimes decentralized if the contract authority is statewide or regional. If so, the programs are run in district or county offices.

Mobility is basically the result of the fact that the agency's jurisdiction covers more than one municipality, thereby permitting the certificate to be used in more than one place. The degree of mobility depends on the size and other characteristics of the area covered and the extent to which the agency provides counseling and other assistance aimed at mobility.

HOW THE MECHANISM WORKS

Generally, the administering agency to which HUD has allocated the contract authority issues the certificates and writes the checks. When it is a statewide or regional agency, it sometimes sub-contracts to other agencies. In these cases, the state agency usually still writes the checks, but most or all of the administration is done by the sub-contractor(s). An exception is the Commonwealth of Massachusetts, where the state has subcontracted its contract authority to non-profit agencies which administer the program in their region AND write the checks.

For purposes of this discussion, the agency which operates the program will be referred to as the administrative agency. If a different agency receives the contract authority from HUD, it will be referred to as the primary agency.

In cases where there is a statewide primary agency, there is usually an official sub-allocation of certificates to counties, fair market rent areas, or SMSA's and non-metropolitan areas. This is worked out by the state agency and HUD. When the primary and/or administrative agency must report to HUD on the basis of these sub-allocations, an effort is usually made to balance

interjurisdictional moves so that the ultimate use of funds corresponds to the agreed-upon allocation. This is a bookkeeping effort and does not, by itself, translate into geographic limits on the use of certificates.

In cases where the administrative agency receives the contract authority directly, there is not usually any further sub-allocation, in which case the agency is not required to report its results to HUD on the basis of where the certificate holder was originally living. In these programs, a household obtaining a certificate can use it anywhere in the administrative agency's jurisdiction with no special administrative requirement.

In all of the programs within this mechanism, once a household obtains a certificate they can move anywhere in the jurisdiction of the administrative agency, which in all cases is interjurisdictional. In addition, in some cases the certificates are considered to be valid statewide. In these instances, mobility is, at least theoretically, available within a larger area than that covered by the administrative agency alone.

ADMINISTRATION

The usual procedure in these programs is for the administrative agency to keep a central waiting list for its jurisdiction. Sometimes waiting lists are kept separately by county or municipality, but a household obtaining a certificate is, nonetheless, free to use it anywhere in the region. The separate lists are to ensure that each county or municipality can be certain that its residents receive a share of the certificates available to the region as a whole.

In some states, the certificate holder can move to another administrative agency's jurisdiction without going to the bottom of a new waiting list. In other instances, such as Georgia, West Virginia and New York, a household wishing to move to another administrative agency's jurisdiction must wait longer for assistance because they go to the bottom of the waiting list in the new jurisdiction. In such cases, mobility is more limited.

Funding for these programs has been almost solely from Section 8 administrative monies, although in some cases Community Development funds are used for a counseling component. Most of them are administered by governmental agencies and or Councils of Government. In Massachusetts there are 7 nonprofit corporations with whom the state has subcontracted to run its Section 8 program. The non-profits run other programs as well, but they are funded separately from the Section 8 Existing program.

COUNSELING AND OUTREACH

Not much counseling or outreach has been associated with these programs other than the briefing required by HUD as part of the Section 8 Existing program. The exceptions are in a few programs aimed specifically at mobility. The Western Piedmont COG's mobility program, for example, includes outreach to people on the regular Section 8 waiting list to inquire whether they have an interest in moving and a counseling component focused on improving the quality of housing chosen by the certificate holder. The Mid-Ohio Regional Planning Commission in Franklin County has contracted with the Columbus Urban League and with the Archival System, Inc. for extensive outreach and counseling.

PROS AND CONS

The single most important advantage of this type of interjurisdictional program is its simplicity. A household is able to use a certificate in several or many jurisdictions without submitting separate applications or going on another waiting list. In addition, where the administrative agency's certificates have not been suballocated, the move occasions very little or no increase in administrative chores and paper work for the agency.

However, a problem arises in the event that a program covers several jurisdictions, usually counties, where HUD has suballocated a specific number of certificates to each. In these cases, the agency administering the program is required to keep records and report the use of certificates in the original jurisdiction. This is a circumstance under which such a program produces a more complicated, rather than a simpler, administrative procedure for interjurisdictional moves.

Rural areas find the pooling of resources and certificates resulting from this kind of program to be an advantage. Most jurisdictions in these regions are small and do not have the structure or administrative capability to run their own programs. They would also not be allocated enough certificates by HUD to cover the administrative costs of setting up and running their own program.

The degree of mobility achieved by these programs is ultimately dependent on several factors. The geo-political scope of the area covered is clearly relevant. A program coordinated on a statewide basis, as in Massachusetts or Michigan, provides a wider locational choice, all things being equal, than a program covering a single county. Broader choice is also achieved if the region covered includes more than one type of area. The Rochester

Housing Authority, for example, can offer urban, suburban or rural housing opportunities, while the White River Planning and Development District or the Housing Authority of Pinal County cover only rural areas.

An additional factor in the determination of the degree of mobility is that of intent. Not all of these programs were established with the explicit goal of providing interjurisdictional mobility. In some cases, the decision to cover more than one jurisdiction was a purely administrative one, and the issue of mobility between those jurisdictions was not considered and remains irrelevant to administration of the program. In other cases, although the structure of the program came about for other reasons, the opportunity to offer broader locational choice has been recognized and an attempt made to take advantage of that opportunity. Where direction of the program has focused on mobility either as the primary reason for the program or as a coincidental advantage, there is clear agreement that this type of program can relatively simply produce some degree of opportunity for interjurisdictional mobility.

PROGRAMS ADMINISTERED BY A CENTRAL AGENCY OVER MORE THAN ONE
JURISDICTION

Arizona:

Pinal County Housing Authority
132 certificates available for use county-wide administered through a county office.

Arkansas:

White River Planning and Development District
96 certificates available for use anywhere within a 10 county region administered through county offices.

Florida:

Dade County Regional Housing Mobility Program
25 certificates available for use anywhere in Dade County from concentrated to unconcentrated areas.

Georgia:

Georgia Residential Finance Authority
5000 certificates available for use state-wide administered through 17 area offices.

Maine:

Maine State Housing Authority
727 certificates available for use state-wide with new waiting list required if the move is out of county: administrative agencies variable.

Maryland:

* Department of Economic and Community Development
37 certificates available for use in 4-county area administered through regional office.

Baltimore Regional Planning Council
1143 certificates available for use throughout Baltimore metropolitan area administered by local PHA's.

Massachusetts:

* Executive Office of Community Development - Section 8 Program
6484 certificates available for use state-wide administered through multi-county non-profit associations.

Franklin County Regional Housing Authority
373 certificates available for use anywhere in the county (except one town) administered by county office.

* South Shore Housing Development Corporation
64 certificates obtained through a bonus program available

*Case Study in this chapter.

for use in 2 county area administered through a central office.

Michigan:

Michigan State Housing Development Authority
5000 certificates available for use state-wide allocated by SMSA and administered through district offices.

New York:

Department of Housing and Community Renewal, Section 8 Program
6400 certificates available for use within a county in 38-county rural region administered by county offices.

- * Ontario County Division of Human Affairs
100 certificates available for use county-wide administered through a central office.
- * Rochester Housing Authority
1673 certificates available for use in 5 county region administered through a central office.

North Carolina:

Western Piedmont COG
312 certificates available for use within a 4-county region administered through a central office.

55 certificates for use within 4-county region obtained through Mobility Demonstration Program for moves from concentrated to unconcentrated areas.

Ohio:

- * Mid-Ohio Regional Planning Commission
500 certificates available for use throughout Franklin County (except Columbus) with administration shared by PHA and regional agency.

Public Housing Authority of Columbus, Ohio
500 county and 2000 city certificates available for unofficial swaps for moves from county to city or vice versa.

Oklahoma:

Oklahoma Housing Finance Agency
4400 certificates available for use state-wide administered through district offices.

South Carolina:

South Carolina State Housing Authority
953 certificates available for use state-wide administered in county offices or by local PHA.

South Dakota:

South Dakota Housing Development Authority
1373-1422 certificates available for use state-wide
allocated by fair market rent area and administered
through field offices.

Washington:

Chelan-Douglas Housing Association
126 certificates available for use in 2-county area
administered through central office.

West Virginia:

West Virginia Housing Development Fund
Moves possible within county, with new list necessary
for move to another county.

Wisconsin:

Dane County Housing Authority
335 certificates available for use county-wide
administered through county office.

The program is entirely funded from Section 8 monies.

Evaluation

This program began in February, 1981. The department started it as an experiment to increase mobility in rural areas, and they are very satisfied with the results. They would like to increase the number of certificates available, and would like to use this format for Existing Section 8 in other rural areas.

The regional administrator reports that none of the applicants have leased outside of their own county, although some have looked after a unit in their own county was impossible to find.

Out of the 37 available certificates, 10 have been leased and 2 of those involved a move to a different town.

EXECUTIVE OFFICE OF COMMUNITIES AND DEVELOPMENT (EOCD), MASSACHUSETTS
BUREAU OF RENTAL ASSISTANCE

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Section 8 Program Planner
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Boston, Massachusetts 12202
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The Agency and its Region

EOCD is a state agency authorized by law to develop and operate housing for low income individuals and families. The department also qualifies by HUD's definition as a public housing agency.

The state of Massachusetts has a 1980 population of about 5,700,000, of which only 7% are minority. The State has a total of over 2 million housing units including just under half in buildings containing two or more units. In 1970, about 40% of all households were renters.

The Program

The EOCD is involved in Section 8 Existing Program in Massachusetts in two ways:

- I. The office functions as a public housing agency in charge of 6484 statewide certificates.
- II. The office has been working with local housing authorities to design and implement a Pilot Mobility Program that establishes arrangements that increase locational options for holders of local certificates.

How the Programs Work

I. The EOCD operates a Section 8 Existing program that covers the entire state except for Franklin County. This program is in addition to whatever programs are run by local PHA's. There are 6484 certificates in the program.

In the Boston metropolitan area the state runs the program directly. Everywhere else the office has contracted with 7 non-profit corporations to administer the program. HUD divides EOCD's 6484 certificates among the 7 non-profits on an SMSA basis.

The department also has a cooperative arrangement with Franklin County, which is the only region not covered by one of the non-profits under contract. The Franklin County Regional Housing Authority runs a centrally administered interjurisdictional program of its own, in which a household may use a Section 8 Existing certificate in 25 out of 26 towns in the County. The Authority also works with the non-profit corporations when a household wants to move into or out of its jurisdiction.

This EOCD program offers statewide mobility because although the contract authority is actually subcontracted to the non-profits, the certificate is considered a state certificate and can be used anywhere in the state.

The 7 non-profit corporations are:

Community Teamwork, Inc. - Middlesex and Essex
 Southshore Housing Development Corp.- Plymouth & Bristol
 Housing Assistance Corporation - Cape Cod
 Rural Housing Improvement, Inc. - Worcester
 Housing Allowance Project - Hampshire
 Construct, Inc. - South Berkshire (Great Barrington)
 Berkshire Housing Services - North Berkshire

II. The EOCD has also been operating a Pilot Mobility Program for a year in which participating local PHA's turn over some of their certificates to EOCD. People applying to EOCD who wish to move to that PHA's jurisdiction are issued those certificates. Administrative fees are split. During the past year, 8 PHA's contributed a total of 130 certificates to the program. The PHA's involved were:

MAPC region: Watertown, Cambridge, Norwood, Marlborough,
 Littleton, Stoughton.

Worcester region: Pepperil

Hudson-Hamshire region: Westfield

Seven more counties are joining the program this year.

In addition, the EOCD has a unique certificate exchange arrangement with the Boston PHA. The Boston PHA tells their clients that they may move anywhere in the state. Those certificate holders who choose to move to another region are permitted to do so. The non-profit corporation covering that region takes over the administration, and the administrative fees, for one of the 700 units the EOCD has in Boston.

Evaluation

Following is a summary of the results of the Pilot Mobility Program through July 22, 1981 for the towns in the MAPC region:

| Issuing PHA | # Certificates Used Within Issuing Jurisdiction | #Certificates Used Outside of Issuing Jurisdiction |
|-------------|---|--|
| Watertown | 4 | 5 |
| Norwood | - | 2 |
| Stoughton | 1 | - |
| Marlborough | 13 | 2 |
| Cambridge | 8 | 5 |
| Littleton | - | 4 |
| | | <u>18</u> |

The Massachusetts Non-Profit Housing Association has been compiling statistics on mobility under the statewide program. To date there are data from Housing Allowance Corporation, South Shore Community Development Corporation, Housing Allowance Project and Rural Housing Improvement, Inc. Out of a combined total of 1693 moves, these 4 corporations report 290 interjurisdictional moves at initial leaseup and 118 interjurisdictional moves at renewal, or a total of 408 moves, 24.09%. The results by region are as follows:

| | Sample Size | I-J Moves at | | I-J Moves at | | Total I-J Moves | |
|---|----------------|--------------------|---------------|-----------------|-------------|-----------------------|---------------|
| | | Initial Leaseup | % | Renewal | % | Moves | % |
| Housing Allow- ance Corp. | 317 | 99 | 31.2% | 39 | 12.3% | 126 | 39.7% |
| So. Shore Hous- ing Development Corp. | 344 | 70 | 20.3% | 47 | 13.6% | 92 | 26.7% |
| Housing Allow- ance Project | 636 | 70 | 11% | 21 | 3.3% | 91 | 14.3% |
| Rural Housing Improvement | 396 | 51 | 12.9% | 31 | 7.8% | 78 | 19.7% |
| TOTAL | 1693 | 290 | 17.13% | 118 | 6.9% | 408 | 24.09% |

Most of this information was collected on a sheet that asked:

- Which community the certificate holder lived in when the certificate was issued.
- Which community the certificate holder moved to.
- Which community the certificate holder moved to at the first and second renewal.

Without intimate knowledge of which communities are in each of the non-profits' region, it was not possible to tell from the data sheets how many moves from one region to another were made. Only Housing Allowance Project reported these moves on a summary sheet. They indicate that 8 moves were made into the region from elsewhere.

The EOCB is happy with both of these programs and believes they provide substantial mobility and housing options. They cite as their chief problem the fact that local PHA's don't like the dual administration of the Section 8 Existing program.

William Breitbart, the President of Massachusetts Non-Profit Housing Association reports that Massachusetts NAHRO has filed suit "challenging EOCB's right under state law to administer the Section 8 Program in jurisdictions which have a housing authority interested in running the program," and seeking the immediate transfer of all units leased by EOCB and the non-profits to these local PHA's. Mr. Breitbart contends that the local PHA's have demonstrated that they are not committed to the mobility aspect of the Section 8 Program, and that, therefore, the transfer of units being sought would seriously inhibit mobility in Massachusetts.

SOUTH SHORE HOUSING DEVELOPMENT CORPORATION
KINGSTON, MASSACHUSETTS

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Kingston, Massachusetts 12364
(617) 585-3885

The Agency and its Region

South Shore Housing Development Corp. is the non-profit corporation with which Massachusetts State EOCDC contracts to administer the Section 8 Existing program in Plymouth and Bristol Counties. Section 8 is the largest part of the agency's program, but they also do moderate rehabilitation and 707 rental assistance. There are two efforts underway to develop Section 202 units. The agency was incorporated in 1970 and began the Section 8 program in 1975. There are eleven people on the staff.

The two counties are fairly rural except for the cities of Plymouth and Bristol. There are also a few old mill towns with populations of about 100,000. There are a total of 41 jurisdictions.

The Program in Brief

This is a centrally administered interjurisdictional program. A Section 8 Existing certificate obtained from the corporation can be used anywhere in the 2 counties, including the cities. In addition, the certificate is a state certificate and can, therefore, be used anywhere in Massachusetts. If a household wishes to move out of the corporation's region, the agency will contact the appropriate non-profit corporation which administers the program in the jurisdiction to which the move will be made.

There are 499 certificates in the program. In addition, the corporation plans to use 64 AHOP bonus certificates to "encourage moves out of bad neighborhoods."

How the Program Works

All of the administration by the region is done in the central office with administrative funds coming from Section 8 monies. HUD allocates the units to the corporation, although the contract authority is the state's. There is no further sub-allocation. There is one central waiting list, ranging from 450 to 1000 people.

Some counseling is done, but it is not locational. They have

done some advertising for landlords, although it is getting easier to find units now that the program is a familiar one. Notices are left with present landlords.

The 64 bonus certificates will be issued only to families currently residing in areas designated as "low income" on the basis of both median income and the condition of the housing stock. The agency hopes to start certifying clients in October 1981. The program was conceived and initiated with a meeting of social service agencies in the area. There will be more counseling involved than there is in the regular Section 8 program.

Evaluation

The Director thinks that this regional method of operating on existing Section 8 program encourages mobility because it is not necessary to recognize town lines.

The agency has studied the moves of 344 out of 499 of the participants. They find that: 32.8% changed units at the initial leaseup, and 45.3% changed units at some time during their participation in the program; 20.3% moved to another town at the initial leaseup and 27% relocated at least once during their participation in the program.

The region under the corporation's jurisdiction contains a part of six SMSA's with a different fair market rent and utility schedule for each one. This is cited as a serious interference with mobility.

Another problem is the hostility of the local PHA's to the statewide Section 8 Existing program run by Mass. EOCDC. The agency understands that some of the opposition is based on the fact that if the state certificates were divided among the local PHA's, those authorities would have more administrative funds to use for other purposes. They point out, in response, that the local PHA's operate only in their own jurisdiction and that the 15 local PHA's in the region have many more certificates than the South Shore Housing Development Corporation.

ONTARIO COUNTY DIVISION OF HUMAN AFFAIRS
CANANDAIGUA, N.Y.

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Canandaigua, N.Y. 14424
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The Agency and its Region

The Ontario County Division of Human Affairs runs a Weatherization program and a Section 8 Existing program county-wide.

The county is part of the Rochester metropolitan area, but it is nonetheless mostly rural. It has a population of nearly 90,000 of which 2% is minority. The two cities in the county are Geneva and Canandaigua. The vast majority of the housing in the region is in single family units, and only 25% of households are renters.

The Program in Brief

This is a centrally administered interjurisdictional program in which a Section 8 Existing certificate holder can move anywhere in the county. The program has an allocation of 100 certificates.

How the Program Works

All of Ontario County, including Geneva and Canandaigua are included in the county's program, although Geneva has its own plan.

The contract authority belongs to the N.Y. State Division of Housing and Community Renewal. All administration is done by the Division, but the State Department writes the checks. Section 8 monies pay for the administration.

HUD has allocated the units to the county and does not sub-allocate. The waiting list is kept county-wide.

There is not extensive housing counseling, but problems are sometimes referred to Legal Aid or other agencies. Some advertising for landlords has been done.

The moves have not been tracked, but they could be. The council

says that the pattern appears to be one of movement away from rural areas and into cities where there are jobs and transportation.

Evaluation

The county-wide program is considered popular and successful, and the council believes it does offer lower income households an increased chance for locational choice. Landlords are also pleased with the program. The division cites the following factors as inhibiting the realization of the program's full potential:

- Fair market rents are unrealistically low
- There is difficulty finding housing that meets the minimum standards.
- There is a need for housing information that can't be filled because of lack of funding.

With respect to mobility, the Director points out that most people really want to move into the cities in the area. Mobility between counties is difficult right now because in order for a certificate holder to move to another county, it is necessary for contract authority to be available in that county. This availability could be ensured by pooling some certificates from each county, but each county fears the loss of funds under that system. Administrative fees are based on the number of units leased. If pooled certificates are not used, then the money is reclaimed by the government, including the percentage allowed for administration. Since requests for these moves are not frequent, each county worries they would lose administrative funds.

ROCHESTER HOUSING AUTHORITY
ROCHESTER, NY

Contact: Maggie Barcher, Deputy Director
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Rochester, NY 14611
(716) 328-6200

The Agency and its Region

The Rochester Housing Authority (RHA) operates the Section 8 Existing Program in the Genessee Finger Lakes Region, including Monroe County, the central city of Rochester, and 4 other counties which are part of the SMSA (Orleans, Wayne, Ontario and Livingston).

The Rochester SMSA includes nearly 800,000 people, of which the city of Rochester contains 250,000. The rest of Monroe County, which has a population of 450,000, is primarily suburban, developing radially around Rochester. The other 4 counties are primarily rural. The region as a whole is about 10% minority. In 1970, about 35% of housing in the region was in buildings with two or more units. Between 1970 and 1981, the number employed in the region increased by approximately 23%.

The Program in Brief

This is a centrally administered interjurisdictional program. The RHA operates a consolidated Section 8 Existing program of 1690 units that covers the 5 counties and includes Rochester. The RHA also has contracts to administer 3 additional programs (the Towns of Greece and Irondequoit and the Monroe Urban County consortium), with a total of 173 units. The Village of Fairport, runs their own program.

Because a certificate may be used anywhere within a region that includes urban, suburban, and rural areas, this program provides a wide range of housing choice. The degree of mobility that has actually been provided is unclear.

How the Program Works

All of the administration for the program is done by the Rochester Housing Authority. The contract authority for the consolidated program (1690 units) goes from HUD to RHA. HUD also allocates to the RHA the contract authority for the Town of Greece (53 units), the Town of Irondequoit (50 units) and the Monroe

County consortium (70 units) and the Village of Fairport. Section 8 funds pay all administrative costs.

Waiting lists are kept separately for the consolidated program and the towns of Irondequoit and Greece. The urban county just received the contract authority for its 70 certificates, and the RHA plans to use the consolidated program's waiting list.

There is not a significant counseling component to this program. The authority has done some advertising outreach to landlords, not-for-profit agencies and governmental agencies.

Evaluation

The authority says it has very long waiting lists and that the fair market rents are not realistic, especially in the suburban areas. According to the authority, mobility is a problem because the rental vacancy rate in the whole region is less than 5%.

Moves have not been specifically tracked, but there are some data and the authority is working on computerization.

MID-OHIO REGIONAL PLANNING COMMISSION
COLUMBUS, OHIO

Contact: David Hamilton
Susan Weaver
514 South High Street
Columbus, Ohio 43215
(614) 228-2663

The Agency and its Region

Mid-Ohio Regional Planning Commission (MORPC) covers Franklin County, the City of Columbus (the county seat) and eighteen townships bordering on Franklin County. MORPC's primary activities are housing and community development and transportation planning. They also are the county zoning and planning agency and they provide data processing support for all of these activities and provide their member governments with time sharing.

Most of Franklin County is urban and suburban, while the eighteen outlying cities are rural. The southeast part of Franklin County is rural and is described as Appalachian.

There are approximately 1 million people in the region; 700,000 of them living in the City of Columbus.

The Program in Brief

Mid-Ohio Regional Planning Commission administers a 500 certificate Section 8 Existing program that covers all of Franklin County except the City of Columbus. Mobility through this program is due in large part to the fact that certificates can be used anywhere in the county except Columbus.

In addition, in order to increase housing opportunity for county residents and to eliminate racial discrimination, the county has entered into one contract with the Columbus Urban League and one with Archival Systems, Inc.

Under its contract, the Columbus Urban League carries out a

program that includes public education, affirmative action and redress for discrimination. The League is a HUD-certified housing counseling agency.

Under its contract, the Archival System, Inc. carries out a program that includes establishing a Human Rights Commission, promoting citizen and neighborhood involvement, and expanding business participation. Archival Systems, Inc. is a private consulting firm.

How the Program Works

The Metropolitan Public Housing Authority receives the contract authority for both the county (500 certificates) and the City of Columbus (2000 certificates).

The Planning Commission takes applications for the 500 certificates allocated to the county. They determine the eligibility of the applicant, do the briefing, and help the certificate holder search for a unit. The PHA does the rest of the administration.

The Planning Commission keeps one waiting list for the county program. Certificates are not suballocated among jurisdictions. If someone in the city wishes to move to the county, or vice versa, the commission and the PHA will exchange certificates, although there is no official agreement.

Counseling and Support Activities

There is a strong counseling component to the program, funded partly by Section 8 funds, and partly by CDBG.

I. The Columbus Urban League was awarded a contract for \$28,650, covering the period of November 1, 1980 through July 31, 1981.

Under its contract, the Columbus Urban League must attempt to increase public awareness of fair housing laws and the extent of residential segregation, and to increase minority residents' awareness of their housing rights as well as existing housing opportunities and services.

To this end, the League performs the following functions:

- 1) Develop audio-visual materials and present them to civic, religious and minority organizations.

- 2) Prepare news releases, solicit coverage of fair housing issues in the newspapers and on the radio, and advertise fair housing services through public service announcements.
- 3) Distribute brochures explaining fair housing laws and services and place display ads in public places.
- 4) Provide information on services to facilitate referrals.

The League also promotes affirmative action by housing developers and residential property owners. This involves analysis and design of plans for marketing in non-traditional areas to minorities, as well as monitoring the implementation and effectiveness of these plans.

In addition, the League holds workshops, provides individual counseling and escort services and supplies current information on available housing. They also refer persons to existing community-based fair housing groups.

Concerning the elimination of discrimination, the League is required to develop a cost-effective method for monitoring patterns of practice in the rental, sale or financing of housing, to seek voluntary compliance when discrimination is found and to initiate legal action if necessary. They must maintain a 24 hour telephone service to receive discrimination complaints, investigate the complaints, seek redress through mediation, and provide free legal assistance.

The Planning Commission is to approve a local legal counsel and help obtain the cooperation of other necessary parties.

II. Archival Systems, Inc. has a contract in the amount of \$24,948, covering the period from August 1, 1980 through July 30, 1981.

ASI is given the responsibility for evaluating structures, programs and activities of human rights commissions in other cities and proposing a plan for such a commission in Franklin County. ASI must also work to expand or establish citizen and neighborhood involvement. The firm works with local governments, public officials, and community leaders to expand or establish community relations departments, sponsor community forums and design research.

Finally, ASI helps 15-20 local business firms, especially large employers who have moved to Columbus, to analyze and improve

their staff relocation and community relations programs. Particular attention is paid to the company's use of real estate firms and informational materials that affirmatively market non-traditional areas to minority employees.

Evaluation

Of the 500 certificates available, about 400 have been leased. One hundred and fifty of those families moved into the city of Columbus. The Commission says it is hard to find Section 8 eligible units in Franklin County.

Moves made under the county program have not been tracked, and the Commission does not know if anyone has moved from the city to the county.

MISCELLANEOUS INTERJURISDICTIONAL HOUSING PROGRAMS

Some programs with the goal of promoting or permitting interjurisdictional housing mobility do not fit neatly into any of the categories established here, yet represent additional examples which should be included. The case studies in this chapter consist of the following programs:

1. Capitol Region Council of Governments
Hartford, Connecticut

Regional Fair Housing Program with Set-Asides

CRCOG works with developers and realtors to set aside a portion of newly constructed projects for City of Hartford residents if the units are in suburban locations and when the units are located in the City of Hartford for residents wishing to move within the City but to a neighborhood with a lower proportion of minority and lower income residents.

2. Fair Housing Council of Orange County
Santa Ana, California

Housing Employment Location Proximity (HELP)

Fair Housing Council works with developers and employers to promote affirmative marketing in Section 8 family housing and to help low income employees living in impacted areas to relocate within non-impacted census tracts.

3. Metropolitan Area Planning Council
Boston, Massachusetts

Fair Housing Counseling and Referral Network

MAPC, as part of its RHMP and AHOP programs, began and coordinates a Fair Housing Counseling and Referral Network which works throughout the region to help low income households find assisted housing in suburban communities. The Network utilizes the services of fair housing agencies in many communities.

4. Metropolitan Council
St. Paul, Minnesota

Reservation of Units by Suburban Developers for City Residents

Metropolitan Council obtains agreements from developers of Section 8 housing in suburban areas to set aside a portion of the units for eligible households from St. Paul and Minneapolis.

REGIONAL FAIR HOUSING PROGRAM WITH SET-ASIDES

CAPITOL REGION COUNCIL OF GOVERNMENTS
HARTFORD, CONNECTICUT

Contact: Barbara Barhydt
Capitol Region Council of Governments
214 Main Street
Hartford, Connecticut 06106
(203) 522-2217

The Agency and its Region

The Capitol Region Council of Governments (CRCOG) consists of the City of Hartford and 28 suburban towns. There is no county government structure in Connecticut and, as a consequence, all planning and implementation decisions are made by local jurisdictions with the assistance of regional agencies.

The total population for the region is 668,479 and approximately 15% of that population is minority.

CRCOG operates an interjurisdictional housing program using Existing Section 8 certificates which is discussed in the "Reservation and Set-Aside" chapter of this study as well as the program described below.

The Program in Brief

The Capitol Region Council of Governments has been working with developers and realtors to set aside units to be made available to households through the Regional Fair Housing Program. In new construction projects in suburban areas, the units are set aside for City of Hartford residents who wish to move to a suburban location. In new construction projects within the City of Hartford, the units are set aside for households who are being relocated or who wish to move from their own neighborhood to one within the City of Hartford which has a lower proportion of minority or lower income population within it.

The Regional Fair Housing Program and Regional Counseling Program are components of the Capitol Region Council of Government's interjurisdictional housing program. These programs are an outgrowth of CRCOG efforts to support and enforce antidiscrimination laws in the State of Connecticut. Connecticut state discrimination laws are stronger than Federal Civil Rights laws and CRCOG's efforts in these areas are part of its work with the State to fight housing

discrimination.

How the Program Works

The Regional Fair Housing Program is funded through Community Development Block Grant Small Cities and Entitlement funds. The program has also been supported, in part, by grants from some major foundations. In addition, CRCOG charges a fee to developers and realtors for the services CRCOG offers them in assisting them in meeting their affirmative fair housing marketing obligations.

The Regional Counseling Program works directly with clients. There are two funded non-profit fair housing organizations in the region but both are without full time staff. The major relationship in counseling is between the client and CRCOG, the developer, and PHA. CRCOG checks the applicant's financial feasibility, need for support services, vacancies available, and current waiting lists. CRCOG has also prepared directories describing the various towns in the region and has held seminars for landlords and realtors about the Section 8 housing program.

Part of the history of this program involves a court case brought by Bloomfield, Connecticut against seven towns of Connecticut for racial steering. The court ruled in favor of Bloomfield and a part of the remedy was for CRCOG to establish a mechanism to prevent future racial steering.

Evaluation

Since the program's inception over three years ago, there have been approximately 600 interjurisdictional moves using Section 8 certificates. In addition, CRCOG anticipates the completion of some 200 Section 8 units throughout the region during this year and the use of some of these for interjurisdictional moves.

CRCOG views this program as a success and anticipates continuing in these efforts. However, eligible Section 8 applicants from suburban towns express concern that residents from the City of Hartford are getting preferential access to Section 8 units built in suburban areas. CRCOG reports that the problem has been solved by getting the developer to agree to also set aside a portion of the units for Section 8 eligible applicants within the suburban area.

HOUSING EMPLOYMENT LOCATION PROXIMITY (HELP)

FAIR HOUSING COUNCIL OF ORANGE COUNTY
SANTA ANA, CALIFORNIA

Contact: Ralph Kennedy
Fair Housing Council of Orange County
1525 East Seventeenth Street
Santa Ana, California 92701
(714) 835-0160

The Agency and its Region

The Fair Housing Council of Orange County is a not-for-profit organization that promotes expanded housing opportunities and strives to reduce housing discrimination in Orange County. Through the use of community outreach programs and individual counseling, the Fair Housing Council's counselors inform people of their rights and responsibilities under the law. Its services include those that deal with housing discrimination, landlord/tenant disputes and low income housing.

In 1964, the Fair Housing Council began operation as a private corporation to support California and Federal fair housing laws. Funding is mainly through Federal grants and private donations.

Orange County is a predominantly urban county with 26 cities and several unincorporated areas. Its total population is 1.9 million. Racial groups represented, in addition to the White population, include Black; Spanish origin; Indian, Eskimo, and Aleut; Asian and Pacific Islanders and others. Persons of Spanish origin are the largest group other than whites. Orange County is growing and has gained over one-half million people since the 1970 Census.

The Program in Brief

Working with the Southern California Association of Governments (SCAG) and Orange County, the Fair Housing Council operates several activities to expand housing choice for lower income and minority persons. The particular activity discussed here, called Housing Employment Location Proximity (HELP), began in August 1980 as a project to promote affirmative marketing for developers of Section 8 Family housing, and to enable lower income households in impacted census tracts to relocate in Section 8 Family developments built in the non-impacted census tracts of Orange County. Target areas for the program include those census tracts in Orange, River-

side and Los Angeles Counties that have greater than 50% lower income households, or greater than 50% minority population, or both.

How the Program Works

HELP's purpose is to assist households now living in impacted areas to know about and make use of affordable housing opportunities in non-impacted areas. The Fair Housing Council attempts to bring together eligible lower income households working in Orange County, developers of new Section 8 housing and major companies with numbers of low income workers.

The Fair Housing Council acts as the coordinator of the project. It provides an information clearinghouse and works with other fair housing groups, housing authorities, city staffs, local employers, developers, real estate industry, employment training centers and others.

HELP personnel meet with low cost housing developers, employers of lower income persons, management firms, and employees (usually as employee associations), in order to explain the HELP program and to show the benefits and facility of living closer to where a person works.

Outreach methods used by HELP include developing and distributing flyers to employees; obtaining an invitation by an employer or employee association to make a presentation to the employees; obtaining lists of eligible employees from employee associations, unions, or employers; and arranging for publication of HELP articles in company newsletters or similar publications.

When applicants call or contact HELP in response to one of these outreach methods, a pre-application form, as developed by Fair Housing Council, is completed. Applicants are then told whether they meet the criteria well in advance of the date for applications to be taken by the developer for low cost/affordable housing being constructed in Orange County. If so, they are contacted and receive assistance in filling out and submitting the necessary application forms for the housing. HELP does not guarantee that a dwelling unit will be found, but only that applicants will know about and have access to all affordable housing opportunities near their employment.

Services are available to all at no charge, and all materials and assistance are available in both Spanish and English. Upon request, Indochinese translators are also available.

Evaluation

Early results have shown that newsletters, especially those from the larger companies, have yielded the greatest response to the HELP program. HELP personnel, therefore, have begun to use company newsletters as their most important initial outreach method.

Fair Housing Council continually updates its list of affordable housing opportunities by on-going contact with housing consultants, developers and managers and realtors who deal with low cost housing. As of February 15, 1981, they had 22 affordable housing opportunities on their list.

The process of contacting employers is also continuing, and has included hospitals, municipalities, and private industry. As of February 15, 1981, the outreach methods had yielded responses from 9 Black families, 30 Anglo-American families, and 30 Hispanic families. Of these 69 responses, 47 were from newsletters, 4 were referred by the employer, 10 as a result of a HELP presentation, 4 were from referrals by the union or employee association, and two each were from flyers, handed out or posted. Two other responses were the result of referral by the Fair Housing Council.

Every employer contacted by HELP had been aware of housing problems experienced by their employees. All of them agreed to cooperate with the project; however, the degree of this cooperation has varied. This means that some persons have greater access to the program than others unless HELP itself fills in for those employers devoting less time and energy to promoting the program.

FAIR HOUSING COUNSELING AND REFERRAL NETWORK

METROPOLITAN AREA PLANNING COUNCIL
BOSTON, MASSACHUSETTS

Contact: Wendy Plotkin
Metropolitan Area Planning Council
110 Tremont Street
Boston, Massachusetts 02108
(617) 451-2970

The Agency and its Region

Metropolitan Area Planning Council is the regional planning agency and the Council of Governments for the Boston Region. MAPC's membership is made up of the chief elected officials from the 101 cities and towns in the region; the eleven local, regional, and state agencies in the region; and 21 gubernatorial appointees who represent consumers and minority persons.

MAPC provides planning assistance in regional economics, natural resources, water quality, transportation, housing, land use, energy, urban design, and other areas of interest to their membership.

MAPC operates a Regional Housing Mobility Program and an Areawide Housing Opportunity Program, as well as a "Section 8 Administrators Association program" discussed elsewhere in this study.*

The area served by MAPC is urban and suburban in character. Boston and some of the older suburbs have, in recent years, experienced population loss, while the inner suburbs have remained stable or gained in population and the newer, outlying suburbs have grown. The core communities and older, inner suburbs have retained elderly households and have experienced an in-movement of lower income households of all races.

The region's total population is approximately 2.8 million of which about 10% consists of Black and other minority groups.

* See "Reservations/Set-Aside" chapter.

The Program in Brief

As a component of its HUD funded Regional Housing Mobility Program and Areawide Housing Opportunity Plan, MAPC started a Fair Housing Counseling and Referral Network. This network helps lower income and minority persons to find assisted housing opportunities in suburban communities of the region where jobs, accessible by public transportation, are available.

Also in the network, clients can learn about the location of hospitals, jobs, and schools and services in communities with which they may not be familiar. They can also receive information on new subsidized housing, application procedures, what a particular community is like, or other information that may help a person determine if a move to a new community will be beneficial. In another component of this program, MAPC assists developers participating in federal subsidy programs to meet their affirmative action goals and requirements.

The members of the Fair Housing Counseling and Referral Network contact housing authorities in the region to offer their services to families holding Section 8 certificates who may desire to move to another community in the region.

Members of the Network include:

South Shore Coalition for Human Rights
 Concillo-Hispanic
 Arlington First Unitarian Universalist Parish Church
 Concord/Carlyle Human Rights Council
 Roxbury/Dorchester APAC

How the Program Works

MAPC has signed a contract for services with each of the agencies in the Fair Housing Counseling and Referral Network. Each agency provides services to Regional Housing Mobility clients desiring to move into their jurisdiction. MAPC serves as the coordinator for the activities of the agencies in the network.

In each agency in the network a staff member has been designated to be the contact person for the Regional Housing Mobility Program. This person makes sure that other staff persons in that agency know about the Regional Network and its services.

Each agency distributes MAPC brochures and other materials to

assist clients to find housing and related services. In addition, each agency must be represented at a minimum of two MAPC training workshops per year. At these workshops they have the opportunity to meet persons from other housing referral service agencies in the core communities, as well as to receive information regarding laws and regulations concerning discrimination and various aspects of the housing market.

Agencies in the program provide services to clients on problems stemming from landlord-tenant disputes, rent increases, evictions, substandard housing conditions, etc. If an agency cannot directly solve a particular problem, they will make the referral to the appropriate agency in the program.

When households have expressed an interest in moving to a new location, network staff help to assess the client's financial condition, and provide information regarding opportunities available in suburban communities. They also may arrange for the client to meet with local fair housing groups in the suburban community and to receive a tour of that community. Additionally, they provide information on tenant's rights and responsibilities, how to purchase a home, condominiums and cooperatives, and all aspects of housing discrimination.

After a move is made, the local fair housing group assumes the major responsibility for easing the transition. Should problems develop, the Housing Referral Network may be called upon to help. In the event that the household decides to return to their original locality within the first six months following the move, the Housing Referral Network will help to find a unit in their original jurisdiction or in a community more to their liking.

In addition to the Fair Housing Counseling and Referral Network, MAPC also works with local fair housing groups so that their services may be available to the Regional Housing Mobility Program. MAPC and representatives from the appropriate local fair housing groups meet with HUD, the Massachusetts Department of Community Affairs, and the Massachusetts Housing Finance Agency and other funding agencies to obtain agreements for local fair housing groups to participate in tenant selection procedures for new and existing developments in their communities. As appropriate, local fair housing groups are notified of vacancies by local housing authorities, as well as of newly constructed or rehabilitated units by developers.

Each local fair housing group must send a representative to two MAPC-sponsored workshops a year. Each local agency must also provide bi-annual and final reports to MAPC which include a description of this program and suggestions for improvements.

Separate from but in keeping with the AHOP and RHMP objectives, MAPC has signed a contract with the Citizen's Housing and Planning Association (CHPA) to carry out a three-faceted fair housing program for the region. This program involves interjurisdictional Section 8 counseling, landlord outreach, and affirmative marketing assistance to developers. Funds for these services expire on July 1982.

Evaluation

The South Shore Coalition for Human Rights reports that they have served and placed 33 households. However, most were not referred by groups in the program. It has been far easier to place individuals than families.

One major problem is a shortage of affordable, adequate housing in the region. Condominium and cooperative conversions in the regions are reducing the stock of rental housing, making the problem worse. Another problem is the fair market rent limit of the Section 8 certificate, which is not realistic. Still another problem is the lack of public transportation between Boston suburban areas.

Many residents in the region and some of the referral and counseling groups viewed the Regional Housing Mobility Program as a tool to aid displacement of lower income and minority persons from central city areas. Minorities tended to be suspicious of MAPC and of the program because they were not involved in its planning.

There was also a lack of cooperation with the PHA's, which are permitted to establish residency preference in the Commonwealth of Massachusetts, and which prefer to serve their own applicants first. In addition, racial fears have contributed to a reluctance by referral agencies in the network to refer clients to some suburban areas, and to the denial of services to minority clients by some local realtors.

RESERVATION OF UNITS BY SUBURBAN DEVELOPERS FOR CITY RESIDENTS

METROPOLITAN COUNCIL
ST. PAUL, MINNESOTA

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300 Metro Square Building
7th Street and Robert Street
St. Paul, Minnesota 55101
(612) 291-6359

The Agency and its Region

Minnesota state legislature has given power to the Metropolitan Council to operate housing programs and to operate as the Metropolitan Council Housing and Redevelopment Authority.

The Metropolitan Council has jurisdiction over the Twin Cities region which includes nine counties and 57 suburban jurisdictions to the Twin Cities. The Authority operates through agreements with nine housing authorities existing throughout the region. The Metro HRA handles the administration of subsidized housing programs operated by the Council, and serves as an HRA in 63 participating suburbs, mostly communities that have no HRA of their own.

The Metropolitan Council administers other interjurisdictional housing programs, including a Certificate Exchange Program, described in a separate chapter of this study.* In the program treated here, residential developers in suburban areas of the Twin Cities region agree to reserve a portion of their units for use with Section 8 certificates made available to households from central city areas who wish to move to suburban locations.

The Program in Brief

The Metropolitan Council obtained commitments from residential developers, utilizing 1980 Section 8 Bonus certificates, and developers of Section 8 new construction buildings and other new subsidized building, in suburbs throughout the area, to reserve 10-25% of their units for residents of Minneapolis and St. Paul.

The program is funded with \$65,000 of HUD Section 701 Bonus Funds awarded to the Metropolitan Council for 1980-1981 to be used to assist in and further their Areawide Housing Mobility Program.

* See "Exchange/Transfer" chapter.

The program resulted in the reservation of a total of 90 new units for households from Minneapolis and St. Paul to be filled during 1981 and 1982 with the use of Section 8 certificates.

How the Program Works

The Metropolitan Council housing staff approached developers of new subsidized buildings in suburban areas throughout the region, and asked them to reserve 10-25 percent of their units for residents of Minneapolis and St. Paul. The Council said developers would benefit by receiving referrals from the Metropolitan Council Housing and Redevelopment Authority, which would work with the applicants to match them with suburban locations that fit their needs, and would follow up with counseling. The remaining units in the buildings would be open to anyone who applied for them.

Nearly all of the developers contacted were willing to participate in the program. The developers sign agreements with the Metropolitan Council to hold the reserved units for two months during the initial marketing of the building. During this time, Metro HRA staff refer eligible tenants to the developer for selection. The developer performs all normal marketing and rental duties, including final selection of tenants for the reserved units from the persons referred from Metro HRA.

The program has resulted in the reservation of 90 new Section 8 units in suburban area for households from Minneapolis and St. Paul to be filled during 1981 and 1982. About 2,000 people are on the Metro HRA waiting list for suburban subsidized housing, 900 of them from Minneapolis and St. Paul. These people were notified when the new suburban units became available and were asked to call the HRA if they wanted to apply. Those requesting applications were referred to developers and given information on services available near the new buildings.

Metropolitan Council staff also assist developers in marketing the reserved units, if requested, by advertising units with major employers located near the new buildings as well as using the Metro HRA's waiting lists, "Vacancy Hotline," and Relocation Clearinghouse Newsletter to publicize the reserved units. However, the Metro HRA has received a large response from those on its waiting list interested in these new units. Metro HRA will continue to provide this assistance whenever the reserved units are available.

Applicants for this program receive individualized counseling about the locations. Staff assembled information on schools,

daycare, shopping, transportation and other services available to the new reserved units. Metro HRA staff also complete income verifications for the tenants seeking the reserved units. Counseling is provided during the tenant's move and after to help ensure long-term satisfaction with the new location.

Evaluation

The first reserved units were available for occupancy in July and August of 1981. The Council reports that eligible households have responded quickly and in large numbers seeking these new units.

Since September 1981, six new buildings with a total of 200 units have been rented and filled, including 40 households moving from central city areas to these suburban locations. Two of the developers have requested the Council's participation in second projects as well.

Households moving to the reserved units have been contacted to seek their reactions to their new homes. Each is now living in a two, three or four-bedroom townhouse. A number of these families had been on the Metro HRA waiting list for 2-3 years before being accepted for the new unit. Most of the families have two or three children, although a few have only one or as many as four. About half those selected are single-parent families. One specially-designed unit is occupied by two handicapped persons.

The Metropolitan Council reports that all the families have so far reported that they like their new home better than their last home. Most mention fresh air, open space, quiet, less crime, good schools, and available services as the things they enjoy most about the suburbs. Few mention any transportation problems or other disadvantages to their new homes. While some have mentioned that they spend more time driving than they did in their last home or apartment, they say that the roominess and quiet of their new homes make up for this.

The Metropolitan Council intends to continue this program during 1982 and anticipates filling at least 50 units in eight new buildings in various suburban locations.

PART III - EVALUATION AND CONCLUSIONS

GUIDELINES

As used in this study, the term "interjurisdictional housing mobility program" is one which increases access to housing across jurisdictional lines for lower income and minority households. The essential components of a mobility program, as we define it, should increase the ability to cross jurisdictional lines AND the economic assistance households need to gain access to housing in the new locations.

This study accepts as legitimate the purposes of interjurisdictional housing mobility programs discussed above and in the case studies. It also recognizes the merits in some criticisms of the programs, in that in their implementation has allowed the goals of mobility to be given preference over the right to stay in place.

The most notable criticisms of housing mobility programs were voiced by those who fear they pose displacement dangers for minority communities. Quite different arguments are presented by those who have historically battled any influx of lower income and minority households to their communities.

Criticisms focused on the Regional Housing Mobility Program and, to a lesser degree, the Areawide Housing Opportunity Program, and arise from a basic challenge to the Federal site selection criteria established in the early 1970's. Since these policies grew out of the civil rights movement of the 1960's, critics argue, they have become obsolete for the 1980's. In this view, the current needs of lower income people lie primarily in preventing their displacement from inner city neighborhoods by middle and upper income people. To many, it is quite simply too coincidental that the Federal government is implementing mobility policies at the same time as the white middle class wants to expand its own options in central cities by gentrifying neighborhoods.

Also, some critics say, it is not clear that the assumptions upon which the mobility programs were based have been adequately proven or, in any event, are still supportable.

Mobility programs have often stressed facilitating the movement of lower income and minority persons from central cities into suburban areas. Such an objective apparently assumes that such persons want to move out of central cities; there is something "wrong" with concentrations of lower income and minority persons; suburban areas contain opportunities and offer a way to improve conditions; and new choices need be provided only outside central city areas. To many, these assumptions are increasingly suspect.

If sufficient housing subsidies were provided in central city areas to complement housing mobility programs, it is likely the critics would substantially soften such arguments. But, with increasingly reduced federally assisted housing funds, this is hardly the case. Choice would really be enhanced, the critics say, only if housing assistance made it just as possible for lower income people to remain in the central cities as to move to other locations.

Overall, critics suggest that mobility programs now more readily serve incoming gentrifiers than lower income and minority households. A number of suggestions to address that problem follow.

The principles that follow represent our conclusions as to the guidelines that interjurisdictional housing mobility programs must obey in order to achieve both equity and expansion of choice:

1. A housing mobility program must expand housing choice available to lower income households in terms of quantity and location of that housing.

This principle is the primary objective of interjurisdictional housing programs. While these programs are designed to enhance mobility, their purpose is to increase the access of lower income households to affordable, decent housing. Thus, for a lower income household in a given jurisdiction, such a program increases both the absolute number of affordable, decent housing units and the geographic areas within which those units are provided and accessible to the household.

This implies wider choice. The creation of either a greater number of units or a greater number of jurisdictions alone does not adequately constitute a mobility program. Providing more units within a single jurisdiction--while perhaps necessary--does not increase housing access outside that area. Enabling a household to move to a greater number of jurisdictions without increasing the available supply of affordable, decent housing there merely increases the number of areas where a household may look for yet unavailable housing.

While interjurisdictional housing programs deal directly with the quantity and location of housing, quality issues are not ignored. Since such programs rely on Federal assistance in the provision of housing, quality housing standards are a mandated requirement. However, the interjurisdictional programs do not directly affect the quality of housing, for the selection of a housing unit and its location is at the discretion of each household and, under ideal circumstances, each can select housing which best meets individual desires. The interjurisdictional housing program intervenes to the extent that it protects the right to make that selection and tries to expand the choice where it has been restricted.

2. A housing mobility program must not eliminate a household's choice to live anywhere.

A mobility program must not either intentionally or effectively restrict the access of a lower income household to affordable decent housing, regardless of the location. To do so undermines the basic principle of choice no matter what other opportunities may be enhanced because of the mobility program.

This objective requires the closest scrutiny, for it is always difficult to measure the validity of a program in terms of impact beyond its immediate scope. Part of the controversy over mobility programs resulted from these programs allegedly placing housing opportunities for lower income households in jeopardy - specifically when families were eligible to receive assistance but did not want to leave the neighborhood where they lived.

The right of access to affordable decent housing must not be limited by location. Choice means the ability to select among alternatives: one can stay put, move across the street, or move out of the city. The greater the available choice, the closer the mobility program is to achieving its objectives.

This principle is easier said than done. The difficulty here arises, in part, because housing mobility programs are designed expressly to overcome the "artificial" barriers which prevent households receiving assistance to move to another community if they wish. These barriers are "artificial" because they are used to justify the prevention of households from moving someplace else across town lines. Instead of removing such barriers, most mobility programs have created structures which enable lower income households to get around them. Thus, for example, jurisdictional primacy is left intact, and mechanisms are designed to allow households to "violate" those rules. The problem is not that town lines exist, but that they are allowed to artificially determine the boundaries within which families may move.

This problem has too often resulted in the design of mobility programs that fail to incorporate a larger view of access and, at times, even eliminate some alternatives. Mobility programs should instead focus on removing obstacles to access. Even if this is not possible, the mechanisms designed must not create limits on certain types of access in their attempt to expand others.

And, while households seeking housing mobility are restricted in their access to affordable, decent housing, so are those who wish to stay where they presently live, but for different reasons. Effective

programs can and need be designed to stop displacement, preserve neighborhoods and increase residential security for lower income households in place. While these are not the objectives of mobility programs, these programs must not jeopardize such efforts nor feed the forces that cause displacement. Also, mobility programs must not be used to rationalize not dealing with displacement under the argument that housing will be available elsewhere.

3. A housing mobility program must not restrict the number of households who can change jurisdictions.

The number of households mobility programs can serve is limited by available program resources. This affects both the housing assistance available to the lower income household and the funds available to operate the program.

Thus, a mobility program artificially limits the access it provides if any restriction is placed on the number of households that can participate. Restrictions can happen through the establishment of either a special allocation of certificates only for mobility programs or a specified number of certificates only for those households who choose to move. These practices effectively limit the number of households who can move because "mobility" is permitted only to the extent that the "set aside" number of certificates is available. Restrictions could be imposed in other ways. "Mobility" might be limited only to those households who are employed in a jurisdiction, who have been displaced, etc.

Such restrictions must not be present in a mobility program because they artificially set "priorities" about who should move and limit the number of potentially mobile households through the arbitrary selection of a "set aside".

4. A housing mobility program must not delay or reduce access to resources for the households not wanting to change jurisdictions.

Establishing special allocations or reserving a specified number or certificates has another undesirable effect - to reduce the total resources available to the housing needy population regardless of their mobility status.

This underscores the principle that a mobility program must not distinguish housing assistance resources in terms of the household to be aided. If the program restricts certain funds to "mobility" recipients, those who do not select to move must compete for a reduced total amount of housing assistance funds.

This principle does not mean that mobility programs cannot be designed to enable greater access. It does mean that, prior to a household's receipt of assistance, its choice of location must not determine what resources are available to the recipient.

Probably more than any other, this principle will seem unduly restrictive to those operating mobility programs. Regardless, programs can be effectively designed to enable mobility without arbitrarily removing a portion of the available resources from the total population dependent on those resources for obtaining affordable, decent housing. Moreover, such "set asides" do not inherently increase mobility program's effectiveness. And since they deny access to those reserved funds for housing needy households who do not wish to move, such measures must not be endorsed in a program to ensure housing rights.

5. A housing mobility program must have a strong anti-discrimination component.

Factors that account for lower income families limited mobility are more numerous, and sometimes more subtle, than discrimination. However, there is little question that discrimination would be a substantial barrier to mobility even if all the other problems were solved.

Many lower income families are minority group members who face discrimination in many communities, including some lower income communities with mostly white populations. In addition, middle class and more affluent communities often resist the entrance of lower income families, regardless of their ethnic background or color.

If a mobility program aims to assist as many households desiring to change jurisdiction as possible, it might do so, easily and at the least expense, by locating units in areas where discrimination would not be a factor. But this would effectively limit the range of choices a household can make, and is therefore unacceptable.

Some programs give preference to households desiring to move from an area where the proportion of lower income, minority residents is high to a neighborhood of greater heterogeneity. This approach does not so much combat discrimination as it furthers integration. Although the goal of integration is not irrelevant or undesirable, such restrictions actually do not serve to expand housing choice and are therefore not desirable components of a mobility program.

There are some discriminatory acts which a program aimed at mobility will not be able to control. Some communities, for example, will be hard for lower income or minority families to enter because

their zoning legislation has resulted in the existence of few or no affordable units.

Other aspects of discrimination can be addressed directly, using various combinations of the following activities:

- Education Activities. These may be directed at both consumers and providers of housing, and may include information on rights, obligations and housing discrimination penalties. They may also include efforts to "pave the way" for new, lower income or minority families, hopefully reducing the difficulties that occur if present, non-minority or more affluent residents are frightened or resentful.
- Affirmative Marketing Activities. These involve efforts to inform minorities in all parts of the region about housing opportunities, using media and other techniques. Agencies participating in interjurisdictional programs can monitor the affirmative marketing activities of builders, developers and sponsors of subsidized housing, as well as the lending policies of area financial institutions.
- Testing and Auditing. These are procedures used to determine and document housing discrimination. In many cases, such activities are already being conducted by other agencies in a region. The administrators of the interjurisdictional program should contact these groups and work with them.

All these are expensive, and will draw resources from the less complex process of directing people into communities where discrimination is not present. However, since overcoming discrimination is necessary for enlarging housing choice, such use of resources is entirely proper.

6. A housing mobility program must include a counseling component to provide information and assistance for households choosing to change jurisdiction, without promoting that choice over any other.

One of the most important factors in the administration of a program aimed at interjurisdictional mobility is the quantity and quality of guidance and counseling built into the procedure.

The extent to which a program permitting such mobility actually enlarges a household's locational choice often depends on whether the program includes a counseling component. The amount of counseling may determine both the ease with which a household in the program finds a place to live and the degree of satisfaction after the move.

It is important to note the role of counselors' attitudes. Their approach may determine whether the program can be viewed as one

offering necessary help to households interested in changing locations, or as the means through which families are given undue encouragement to move out of areas of minority concentration, fostering a goal which may be in conflict with the wishes of the minority population.

In order to ensure full freedom of housing choice for certificate holders, HUD regulations mandate that an interjurisdictional move may not, for any reason, be required of a household that has obtained a certificate, even if the certificate is part of a special mobility program. Counseling that creates the appearance of required forced mobility is also prohibited.

Beyond traditional support activities, counseling connected to mobility programs ideally will include assistance especially geared to the problems encountered in changing location. These items include:

- Information Guides and Materials. These generally provide households with information about the supply, location and other factors relevant to the search for housing. They can also offer information on costs, financing and methods for filing discrimination complaints. Often, an informational brochure on the interjurisdictional program itself is developed and distributed, listing program benefits and responsibilities for both housing consumers and providers.

- Individualized, Direct Services. These are designed to provide assistance, usually on a one-to-one basis, to help a household make the best locational choice within the interjurisdictional region. Such services also include working with families to help them determine realistic housing expenditures. They may further include escort and transportation services, child care services and community tours. Follow-up services to aid in the adjustment to a new community are often available as well.

- Outreach and Training. These activities are directed toward housing consumers and providers, as well as advocates for these groups. Outreach services sometimes include contacting employers with workers who may be able to benefit by participating in an interjurisdictional program. Outreach activities may include distribution of materials, workshops, and meetings. Training activities may involve working with housing developers and managers to set tenant selection policies consistent with the interjurisdictional program.

Obviously, successful counseling programs obviously require heavy investments of money and time. In most of the programs described in this study, administrative funds attached to Section 8 Existing housing certificates have allowed, and to some extent required, some degree of counseling. At this writing, these funding sources are being modified substantially. Such changes will probably result in households in the Section 8 program receiving less financial assistance, having more more difficulty finding affordable

units. This will make effective guidance programs even more important. However, it may also make resources for such programs extremely scarce.

7. A housing mobility program must attempt to include a geographic area that at least reflects the traditional housing market in the region.

A mobility program's goal must be to allow lower income and minority households to make the same housing location choices that other families can make. This means they should be able to choose freely between the central city or cities in a region and the surrounding suburban, exurban or rural areas.

If industry is moving to locations within the areas covered, then the incentive to be near work will add relevance to the program and increase its chance of success. The same is true if jobs have been concentrated in parts of the region where lower income households have not traditionally lived.

An ideal mobility program, then, will be set up to cover an entire region, not selected parts of it.

Of course, if most available rental housing is concentrated in certain parts of the region, options for mobility are limited even where substantial assistance is offered. This is often a significant factor in regions where the need for additional mobility is most urgent; for example, in metropolitan areas with central cities that contain a large proportion of the region's affordable rental units and are surrounded by suburbs to which industry is bringing much greater job opportunities.

In exurban or rural regions, the supply of rental housing is usually spread more evenly, thus facilitating mobility. However, these areas do not tend to differ significantly from each other in terms of job opportunity, schools, or transportation, so there is very often little reason for households to move out of a familiar area.

It remains true, in any case, that the larger the region that is covered by a mobility program, the broader the choice that can be automatically offered to households wishing to participate. If their options are identical to those of other segments in the population, then the program can be both relevant and effective.

8. A housing mobility program must include some form of financial assistance.

It is theoretically possible to conduct a mobility program without a subsidy that would be the equivalent of a fair housing and counseling program. However, now and in the foreseeable future, any mobility program for lower income households, like any other housing program for that constituency, must include some form of financial assistance.

It appears that these households will have at least as much trouble in the future as they have to date in acquiring decent housing without such assistance. There is little subsidized production of lower income housing currently being proposed either by HUD or Congress, and the private housing industry is not strong. Residential construction starts remain at remarkably low levels. Practically no new rental housing is being built. And the existing rental stock is being depleted through arson, abandonment, conversions to cooperatives and condominiums, rehabilitation, disinvestment and other forces.

This difficulty is compounded by the expense of moving from one community to another. And the complications that arise when any household moves constitute more of a barrier, psychologically as well as physically, without adequate financial resources.

The programs examined in this study were all based on the use of Section 8 rental assistance, mostly for existing housing. At present it is unclear what shape such Federal assistance will take in the future, or in what quantity it will be available. It is also not clear whether or not states or other government levels will assume some increased responsibility for housing assistance in the absence of Federal aid.

It is clear that any effort to encourage the exercise of a larger number of housing mobility options by lower income families is needed for frustration and failure without some financial assistance.

9. A housing mobility program must incorporate monitoring and evaluation procedures that provide the information necessary to measure the program's effectiveness.

A program that sets out to increase access to housing across jurisdictional lines clearly will seek to effect the largest number of such moves possible. However, if the goal of an interjurisdictional mobility program is to expand housing choice for lower income and minority households, then measuring success by the number or proportion of interjurisdictional moves made, or any variation of this measurement, clearly does not suffice. In fact, such criteria

could have the effect of substituting one set of limitations on housing choice for another, since the option of housing in the same community is excluded.

Success must ultimately be measured through satisfaction on the part of households that have made interjurisdictional moves and, to some extent, in terms of the ease and cost of administering these moves.

Satisfaction, of course, is a hard thing to measure. Procedures for evaluation will probably have to include:

- interviews with people who have moved, including discussions about how comfortable they feel in the new community and whether they have adequate access to services they require;

- interviews with people who wanted to participate in the program but were not able to find a place to which they could move;

- interviews with program participants who chose to stay in place, including discussions of why that choice was made and whether they are still pleased with it;

- some determination of how many households remain in the community to which they have moved, and families' reasons for staying or leaving;

- some evaluation of the ease with which any interjurisdictional moves were made, including the time involved in finding housing and whether any action to combat discrimination was required.

Although it obviously cannot be the sole or most important measure of effectiveness, the cost of the interjurisdictional moves should certainly be included in any such assessment. Costs will be determined by:

- the expenditures required for counseling programs;
- the administrative complexity of the program; and
- the expense of anti-discrimination activities.

Clearly, the cost per interjurisdictional move will be determined by the number of such moves made under the program. If two programs spending the same money achieve different move totals for other reasons, such as job location or housing availability, then their cost per move will differ.

EVALUATION

This study would not be complete without an assessment of the relative merits of the major interjurisdictional mechanisms defined and described herein. Such an evaluation's criteria should include the mechanisms' relative ease of administration and the degree to which each mechanism conforms to the study's guiding principles for interjurisdictional housing mobility programs as well as the programs' effectiveness. To assist in this evaluation, a summary chart is provided comparing the interjurisdictional housing mobility mechanisms.

Concerning the latter, however, only a few general statements can be made. Since very few agencies have systematically evaluated their results, it is not possible to meaningfully assess their effectiveness. In general, the success of mobility programs to date has depended more upon the attitude and interest of the particular programs' administrators than upon their structure.

Ease of Administration

Most successful interjurisdictional housing programs to date have worked through the leadership and support of regional planning agencies or councils of government. Ideally, such agencies' involvement in the administration of mobility programs is highly desirable, facilitating cooperation among multiple jurisdictions, agencies and fair housing organizations.

However, relying on regional agencies causes certain problems. Not all regions contain agencies willing or able to become actively involved in mobility programs. And to implement such programs, regional agencies must work closely with any local public housing authorities (PHA's). Not every PHA, however, is inclined to cooperate with a mobility program run by another agency in its territory. Why not? Primarily because administrative funds that would go to the PHA might be diminished if another agency has any responsibility for assistance in the area. What's more, local housing authorities, especially in large cities, are chronically short of units needed for their own area residents, and are often not eager to divert any resources toward those in other areas.

In the Reservation or Set-Aside mechanism, the programs are heavily dependent upon the role of the regional agency, which performs a variety of functions including supervision, coordination, and counseling. This means that this type of program can only be successful where there is an interested, active regional agency. In addition, cooperative agreements must be obtained from as many as four levels of government.

COMPARISON OF INTERJURISDICTIONAL HOUSING MOBILITY MECHANISMS

| TYPE OF MECHANISM | DISTINGUISHING CHARACTERISTICS OF TYPE | CHARACTERISTICS COMMON TO PROGRAMS IN TYPE | PROCEDURAL VARIATIONS WITHIN TYPE | ADVANTAGES OF TYPE | DISADVANTAGES OF TYPE |
|--|---|---|---|---|--|
| Reservation or Set-Aside of Certificates | <p>All certificates used for interjurisdictional moves must come from a central pool reserved for that use only.</p> <p>Regional agency or COG has supervisory role and conducts any counseling or outreach activities.</p> | <p>Cooperative agreements among participating agencies determine responsibilities of all parties.</p> <p>Certificates available to households on or entering Section 8 waiting lists in participating jurisdictions upon decision to change location.</p> | <p>Certificate pool formed from:</p> <ol style="list-style-type: none"> 1) Bonus Certificates 2) State agency set-asides 3) Reservation of predetermined numbers of participating jurisdictions. | <p>Relatively simple to administer once agreements are exchanged.</p> <p>Considered successful by participating agencies.</p> | <p>Mobility limited by number of pooled certificates.</p> <p>Requires a regional agency for oversight and coordination. Sometimes results in households "jumping" waiting lists.</p> <p>Limits access to resources for households not wishing to move.</p> |
| Exchange or Transfer of Certificates | <p>Participating agencies permit certificates to be used in each other's jurisdictions under agreements which arrange the transfer or exchange of certificates so used.</p> | <p>Cooperation agreements between participating agencies define responsibilities of each. Regional Agency has coordinating role. Household must meet requirements of jurisdiction to which it will move, but may find unit within any of participating jurisdiction as long as number of exchange certificate has not been exhausted.</p> | <p>Agreements either permit unlimited or limited number of exchange certificates to be used.</p> <p>Application and waiting list process occurs in some instances at receiving agency, in others, in agency of original</p> | <p>Relatively simple to administer since number of certificates and usual procedures for administration are unchanged for participating agencies.</p> | <p>In limited type, number of moves limited by number of certificates committed to program.</p> |

(CONTINUED)

COMPARISON OF INTERJURISDICTIONAL ILLEGAL MOBILITY MECHANISMS

| TYPE OF MECHANISM | DISTINGUISHING CHARACTERISTICS OF TYPE | CHARACTERISTICS COMMON TO PROGRAMS IN TYPE | PROCEDURAL VARIATIONS WITHIN TYPE | ADVANTAGES OF TYPE | DISADVANTAGES OF TYPE |
|--|--|--|---|--|--|
| <p>Agreements to Honor Certificates</p> | <p>Participating agencies permit certificates to be used in each other's jurisdiction after which responsibilities for administering certificates stay with original issuing agency.</p> | <p>Cooperation agreements define in detail which administrative tasks are assumed by which agency. Upon receiving certificate household may find qualifying unit within any of the participating jurisdictions. Certificates only honored when certain conditions are met.</p> | <p>"Credit" for certificate is sometimes given to issuing agency and sometimes to receiving agency. Arrangement for sharing of administrative responsibilities and fees are varied.</p> | <p>Number of interjurisdictional moves theoretically unlimited. Resources are available to households wishing to move and wishing to stay in place alike. Relatively easy method to arrange politically.</p> | <p>Sharing of responsibilities for administration of certificates requires complicated set of arrangements and agreements.</p> |
| <p>Programs Administered by a Central Agency over more than One Jurisdiction</p> | <p>Central agency covering multiple jurisdictions administers program, thereby automatically permitting use of certificates in more than one jurisdiction.</p> | <p>Upon receiving certificate household can move anywhere within jurisdiction of administering agency.</p> | <p>Central agency sometimes subcontracts varying amounts of administrative responsibilities to non-profit or other administrative agencies covering smaller regions. Position on waiting list upon choosing to move to new jurisdiction varies; sometimes household must go to bottom of list in new jurisdiction, sometimes not.</p> | <p>Can cover widest area for potential mobility without restrictions on number of moves or on choices of households wishing to stay in place.</p> | <p>Potential effectiveness limited by whether mobility is a goal of the program or accidental coincidence. Counseling activities very limited to date.</p> |

In some programs within this group, the mobility certificate is allocated to the jurisdiction from which the household moves, requiring the added complexity of shared administrative responsibilities by the public housing authorities involved as well as the regional agency. In other cases, however, this aspect of administration is simplified by the allocation of the certificate to the receiving PHA.

Regional agencies also play a role in the Exchange or Transfer programs' which require that cooperative agreements identifying mutual responsibilities be arranged between or among participating jurisdictions. But, the actual administration of programs using this mechanism, after the agreements are obtained, is relatively simple. Once exchanged, certificates which have been transferred are handled in the same manner as all others, and the absolute number of certificates remains unchanged.

For programs under the Agreements to Honor Certificates mechanism, the opposite is true. These necessitate complicated arrangements to spell out each agency's responsibilities in the administration of certificates used for mobility, since tasks are shared. So cooperative agreements which not only commit jurisdictions to participate in mobility programs, but also resolve the problems of shared administrative tasks and funds, must be negotiated.

The Agreements to Honor mechanism, however, does not depend upon regional agency's participation to function. It also has the advantage of being relatively easy to arrange politically with regard to administrative factors like handling residency preferences.

The group defined under Programs Administered Over More than One Jurisdiction by a Central Agency, has more administrative variety. In its simplest form, only one agency is involved; in more complex arrangements, subcontracting to other agencies takes place. Since no cooperative agreements are necessary, and since both contract and administrative authority rest in one place, this mechanism offers the possibility of relative administrative ease.

A basic administrative problem faced by many assistance programs that explicitly aim to enhance mobility involves the management of applicant waiting lists. Often, households seeking assistance can jump the waiting list by accepting a certificate targeted for mobility. In some cases, they can then request a transfer back to their original jurisdiction. In other instances, a household

desiring to change location must join a second waiting list after receiving the certificate that permits mobility. Both systems have unfair elements.

The Exchange/Transfer program run by the New Orleans Regional Planning Commission handles this problem by permitting applicants to join more than one waiting list simultaneously, but not to jump any list. Naturally, this problem does not face programs that provide mobility automatically by covering a wide range of jurisdictions.

However, an administrative difficulty that does arise in such programs is that of differing fair market rents. If a large enough region is covered, it can include both metropolitan and non-metropolitan areas, or portions of more than one SMSA. HUD- assigned fair market rents may vary in different parts of the region, and families seeking mobility often find that they must locate housing at different prices. This tends to inhibit interjurisdictional moves when Section 8 certificates are being used.

Conformance with Mobility Principles

The degree to which these various types of mechanisms meet the study's principles for mobility programs can be assessed by asking four questions: 1) How much is housing choice expanded in terms of quantity and geographic area? 2) Are limits or restrictions on choice or access to resources created for any household? 3) What is the extent of counseling and anti-discrimination components? 4) Is financial assistance provided?

The broadest amount of housing choice, produced with the least restrictions, is created by Programs Administered by A Central Agency Over More Than One Jurisdiction. Under all other mechanisms, the amount of geographic mobility is limited by the need to obtain agreements from agencies and localities to participate. This task is usually difficult to accomplish.

Although it contains many of the programs which have been the most active, the Reservation and Set-Aside mechanism creates a number of limits or restrictions on some households' rights. Their right to move, for example, is limited by the number of certificates in the central pool. And households not desiring to change location are denied equal access to that pool of resources. The set-aside concept thus violates the principles regarding unrestricted locational choice and equal access for all households.

Since most programs within the Exchange or Transfer group impose limits on the number or percent of certificates which can be used for

mobility, this mechanism also gives rise to inequities. Here, the limit on transfer certificates means that only an established number of households are free to move. In these programs, though, households not wishing to move are not denied equal access to resources. This mechanism also includes one variation in which there is no limit placed on certificates eligible for transfer; in this instance, violation of the principle does not occur.

Agreements to Honor programs avoid creating inequities since all certificates are honored without restrictions. But in this mechanism, other limiting conditions like the requirement that a household show that it was impossible to locate a unit in its original jurisdiction, are usually imposed. Such conditions, while more subtle, do violate the principle that states households must be permitted to live anywhere they choose.

The level of counseling and anti-discrimination activities varies widely throughout these program types. The Programs Administered by a Central Agency group, many of which are not mobility programs by intent, tend to have the most limited efforts. The Exchange or Transfer and Agreements to Honor mechanisms usually restrict counseling activities to the regular Section 8 briefings performed by the PHA's involved, with some information about mobility opportunities added.

But in the Reservation and Set-Aside programs, many regional agencies have developed extensive counseling programs as integral parts of the mobility concept. These activities are performed by the regional agency itself, usually with funds provided through AHOP or KHMP allocations.

Finally, all the programs included here rely upon the Federal assistance provided through the Section 8 program as their basic tool. All programs recognize the basic fact that for low income people, the concept of mobility is meaningless without reliable, on-going housing assistance.

CONCLUSIONS

Mobility programs are designed to achieve the worthwhile objective of increasing lower income and minority households' access to affordable, decent housing. To do so, these programs have had to deal with a variety of obstacles to increase access. However, instead of removing the obstacles, most mobility programs design structures for getting around them. These structures, in turn, have sometimes resulted in the limitation of households' mobility rights.

Implementing an interjurisdictional mobility program is difficult at best. Communities and agencies are often unwilling to participate, and only the dedication and forcefulness of people committed to increasing opportunities for lower income people make a program possible. In many cases, the art of the possible becomes a controlling factor in how the program is designed.

While recognizing these difficulties, the Principles for a Mobility Program discussed in this study represent, we believe, guidelines which can be used to establish programs which utilize lessons learned from the pioneering programs, while avoiding their errors.

The Programs Administered Over More than One Jurisdiction by a Central Agency group, since it is the least contrived, comes closest among the current mechanisms to meeting our principles. But if these programs are to effectively enhance mobility, they must, in most cases, enlarge their counseling components and assume a more conscious role as facilitators of mobility.

The other mechanisms which avoid violating our most important principles are the Agreement to Honor Certificates group and the unlimited type of Exchange or Transfer Programs. Although these suffer from the administrative complexities and geographical restrictions discussed above, they represent positive directions in which to move.

As of this writing, there are several proposals for a modified certificate program or housing voucher program which will replace, but in major respects be similar to, the existing Section 8 Program, the basic tool of programs discussed in this study. The design of this program could allow certificates or vouchers to be used to implement interjurisdictional housing mobility programs conforming with the study's principles. For example, a certificate should not be subject to residency preferences and should be eligible for use in any location.

Development of interjurisdictional mobility programs needs support and funding in conjunction with federal housing assistance programs. Such programs should conform to the principles set forth in this study. Particular attention must be given to counseling and monitoring components. Any discussion of housing choice, however, is meaningless in a context of inadequate housing supply. The supply and preservation of housing units available to lower income and minority households throughout metropolitan areas is the necessary foundation for any effort to ensure equal housing choice.