

The Honorable Sylvia Garcia Member House Financial Services Committee US House of Representatives Washington DC

July 23, 2021

Dear Congresswoman Garcia,

I appreciated the chance to testify before the House Financial Services Committee on the topic of federal voucher expansion and housing assistance earlier this summer. Thank you for your follow-up questions for the record. Below are my responses to the items. Please let me know if I can be of further assistance.

Question: There is a growing body of research supporting the fact that access to housing means access to a healthy, productive society. Not only do Housing Choice Vouchers result in increased educational attainment, healthcare access, and lower crime rates, but they help produce a more productive population in general. Can you elaborate on how low-income housing programs can support public health, and thereby bolster economic productivity?

It has been well documented that exposure to chronic stress, such as housing insecurity, in childhood leads to significantly worse health outcomes in adulthood.¹ One meta-regression evaluated health outcomes in individuals along a continuum of economic and housing instability (ranging from the general population to actively homeless), the authors found worse housing insecurity was associated with being uninsured, postponing needed care, postponing medications, and higher hospitalization rates.²

In 2008 the Department of Housing and Urban Development (HUD) executed the <u>Family Options Study</u>, randomly assigning families to receive (1) a subsidy, without supportive services, (2) project-based transitional housing (housing for up to 2 years with on-site support services, (3) community-based rapid re-housing, or (4) usual care. The authors found that government-funded rental assistance reduced poverty and improved overall health outcomes for children. Children in families who received rental assistance demonstrated more prosocial behavior and fewer negative behavioral problems and sleep

¹ Shonkoff, J. P., Garner, A. S., Siegel, B. S., Dobbins, M. I., Earls, M. F., McGuinn, L., ... & Committee on Early Childhood, Adoption, and Dependent Care. (2012). The lifelong effects of early childhood adversity and toxic stress. Pediatrics, 129(1), e232-e246.

² Reid, K. W., Vittinghoff, E., & Kushel, M. B. (2008). Association between the level of housing instability, economic standing and health care access: a meta-regression. Journal of health care for the poor and underserved, 19(4), 1212-1228.



disruptions.^{3,4} Even three years post-assignment, the authors found children in families assigned to permanent housing subsidies completed more school grades than those assigned to project-based transitional housing or usual care.

Better health outcomes and more schooling are natural antecedents to an improved economic future, however, the long-term economic effects of housing assistance is most notably demonstrated in Dr. Raj Chetty's <u>Moving to Opportunity Experiment</u>. After randomly assigning families living in high-poverty neighborhoods housing vouchers to move to lower-poverty neighborhoods, the authors found that children who move before the age of 13 earned 31% more in adulthood than children whose families did not receive housing vouchers. This effect is nonexistent for children over the age of 13, suggesting that the longer children spend in lower-poverty neighborhoods the better the outcome, both personally and socially, in the long-term.⁵

Question: Please provide any data you may have that illustrates the economic multiplier effect of the voucher program.

Although the study's sample consisted of California residents living in LIHTC properties, <u>Dr. Carolina Reid's work</u> on the economic effects of affordable housing is vital to understanding the benefits vouchers could have as an 'economic multiplier.' Reid's work, through the Terner Center, demonstrated that affordability and stability in housing lead to long-term economic mobility.⁶ Residents were able to think beyond day-to-day survival, in many instances leveraging housing stability into college degrees for both parents, as well as, children of these families later on. This naturally leads to a more skilled workforce in our economy.

The most important advantage of housing vouchers is that they give recipients the freedom to choose the kinds of housing and the locations that best meet their needs. Federal housing construction programs have historically clustered assisted families in low-income, central city neighborhoods, contributing to both concentrated poverty and racial segregation. Housing Choice Vouchers -- by providing tenants with the option of finding housing in the private market in many different neighborhoods -- have the potential (if not fully realized) to help counteract patterns of poverty concentration and racial segregation by

³ Gubits, D. et al., (October, 2016). "Family Options Study: 3-Year Impacts of Housing and Services Interventions for Homeless Families," prepared for Department of Housing and Urban Development,

https://www.huduser.gov/portal/sites/default/files/pdf/Family-Options-Study-Full-Report.pdf.

McInnis, D. et al. (July, 2020). "Family Options Study: Long-term Tracking Project," prepared for Department of Housing and Urban Development,

https://www.huduser.gov/portal/sites/default/files/pdf/FamilyOptionsStudy-LongTerm.pdf.

⁵ Chetty, R., Hendren, N., & Katz, L. F. (2016). The effects of exposure to better neighborhoods on children: New evidence from the Moving to Opportunity experiment. American Economic Review, 106(4), 855-902. http://www.equality-of-opportunity.org/images/mto_paper.pdf

Review, 106(4), 855-902. http://www.equality-of-opportunity.org/images/mto_paper.pdf

6 Reid, C., & Stambuk-Torres, B. (2020). Recession and Recovery: The Critical Role of
Housing Assistance in Promoting Economic Security for Low-Income Households.

https://ternercenter.berkeley.edu/wp-content/uploads/2020/12/Recession-and-Recovery-Septem
ber-2020-1.pdf



enabling low-income renters to find and afford housing in neighborhoods throughout a metropolitan region. In addition, housing vouchers serve as an important complement to the resources that local and state governments use to build more affordable housing. Additional project based vouchers can help affordable housing projects pencil, by increasing the amount of commercial debt a project can leverage to assist with construction, and by offsetting the need to find additional gap funding sources to accompany low income housing tax credit equity.

Of equal importance, housing vouchers reduce the economic strain of housing insecurity, in terms of public social, medical, legal, and carceral costs. Santa Clara County conducted one of the largest studies examining the costs of homelessness, finding an average expenditure of \$510 million per year to provide those experiencing homelessness services (nearly two thirds of which went toward medical expenses, with the remaining dollars largely spent on involvement in the carcel system). These only represent public costs, there are also uncalculated costs to businesses, tourism, and the private sector overall in cities experiencing high rates of homelessness.

Question: There is a growing body of research supporting the fact that access to housing means access to a healthy, productive society. Not only do Housing Choice Vouchers result in increased educational attainment, healthcare access, and lower crime rates, but they help produce a more productive population in general. Can you elaborate on how low-income housing programs can support public health, and thereby bolster economic productivity?

It has been well documented that exposure to chronic stress, such as housing insecurity, in childhood leads to significantly worse health outcomes in adulthood. One meta-regression evaluated health outcomes in individuals along a continuum of economic and housing instability (ranging from the general population to actively homeless), the authors found worse housing insecurity was associated with being uninsured, postponing needed care, postponing medications, and higher hospitalization rates. 11

⁸ Flaming, D., et al. (2015). "Home Not Found: The Cost of Homelessness in Silicon Valley." prepared for the County of Santa Clara,

https://www.sccgov.org/sites/osh/ContinuumofCare/ReportsandPublications/Documents/Santa%20Clara%20County%20CostStudyReport.pdf

https://calmatters.org/housing/2020/01/california-homelessness-czar-options-ratings-cost-efficiency/

⁷ Turner, M. A. (2003). Strengths and weaknesses of the housing voucher program. http://webarchive.urban.org/publications/900635.html

⁹ Levin, M. (January, 2020). "You've just been named California's homelessness czar — what's your first move?" CalMatters.

¹⁰ Shonkoff, J. P., Garner, A. S., Siegel, B. S., Dobbins, M. I., Earls, M. F., McGuinn, L., ... & Committee on Early Childhood, Adoption, and Dependent Care. (2012). The lifelong effects of early childhood adversity and toxic stress. Pediatrics, 129(1), e232-e246.

¹¹ Reid, K. W., Vittinghoff, E., & Kushel, M. B. (2008). Association between the level of housing instability, economic standing and health care access: a meta-regression. Journal of health care for the poor and underserved, 19(4), 1212-1228.



In 2008 the Department of Housing and Urban Development (HUD) executed the <u>Family Options Study</u>, randomly assigning families to receive (1) a subsidy, without supportive services, (2) project-based transitional housing (housing for up to 2 years with on-site support services, (3) community-based rapid re-housing, or (4) usual care. The authors found that government-funded rental assistance reduced poverty and improved overall health outcomes for children. Children in families who received rental assistance demonstrated more prosocial behavior and fewer negative behavioral problems and sleep disruptions. ^{12,13} Even three years post-assignment, the authors found children in families assigned to permanent housing subsidies completed more school grades than those assigned to project-based transitional housing or usual care.

Better health outcomes and more schooling are natural antecedents to an improved economic future, however, the long-term economic effects of housing assistance is most notably demonstrated in Dr. Raj Chetty's <u>Moving to Opportunity Experiment</u>. After randomly assigning families living in high-poverty neighborhoods housing vouchers to move to lower-poverty neighborhoods, the authors found that children who move before the age of 13 earned 31% more in adulthood than children whose families did not receive housing vouchers. This effect is nonexistent for children over the age of 13, suggesting that the longer children spend in lower-poverty neighborhoods the better the outcome, both personally and socially, in the long-term. ¹⁴

Question: Please provide any data you may have that illustrates the economic multiplier effect of the voucher program.

Although the study's sample consisted of California residents living in LIHTC properties, <u>Dr. Carolina Reid's work</u> on the economic effects of affordable housing is vital to understanding the benefits vouchers could have as an 'economic multiplier.' Reid's work, through the Terner Center, demonstrated that affordability and stability in housing lead to long-term economic mobility. ¹⁵ Residents were able to think beyond day-to-day survival, in many instances leveraging housing stability into college degrees for both parents, as well as, children of these families later on. This naturally leads to a more skilled

¹² Gubits, D. et al., (October, 2016). "Family Options Study: 3-Year Impacts of Housing and Services Interventions for Homeless Families," prepared for Department of Housing and Urban Development,

https://www.huduser.gov/portal/sites/default/files/pdf/Family-Options-Study-Full-Report.pdf.

¹³ McInnis, D. et al. (July, 2020). "Family Options Study: Long-term Tracking Project," prepared for Department of Housing and Urban Development, https://www.huduser.gov/portal/sites/default/files/pdf/FamilyOptionsStudy-LongTerm.pdf.

¹⁴ Chetty, R., Hendren, N., & Katz, L. F. (2016). The effects of exposure to better neighborhoods on children: New evidence from the Moving to Opportunity experiment. American Economic Review, 106(4), 855-902.

http://www.equality-of-opportunity.org/images/mto_paper.pdf

¹⁵ Reid, C., & Stambuk-Torres, B. (2020). Recession and Recovery: The Critical Role of Housing Assistance in Promoting Economic Security for Low-Income Households. https://ternercenter.berkeley.edu/wp-content/uploads/2020/12/Recession-and-Recovery-September-2020-1.pdf



workforce in our economy.

The most important advantage of housing vouchers is that they give recipients the freedom to choose the kinds of housing and the locations that best meet their needs. Federal housing construction programs have historically clustered assisted families in low-income, central city neighborhoods, contributing to both concentrated poverty and racial segregation. Housing Choice Vouchers -by providing tenants with the option of finding housing in the private market in many different neighborhoods -- have the potential (if not fully realized) to help counteract patterns of poverty concentration and racial segregation by enabling low-income renters to find and afford housing in neighborhoods throughout a metropolitan region.¹⁶ In addition, housing vouchers serve as an important complement to the resources that local and state governments use to build more affordable housing. Additional project based vouchers can help affordable housing projects pencil, by increasing the amount of commercial debt a project can leverage to assist with construction, and by offsetting the need to find additional gap funding sources to accompany low income housing tax credit equity.

Of equal importance, housing vouchers reduce the economic strain of housing insecurity, in terms of public social, medical, legal, and carceral costs. Santa Clara County conducted one of the largest studies examining the costs of homelessness, finding an average expenditure of \$510 million per year to provide those experiencing homelessness services (nearly two thirds of which went toward medical expenses, with the remaining dollars largely spent on involvement in the carcel system).¹⁷ These only represent public costs, there are also uncalculated costs to businesses, tourism, and the private sector overall in cities experiencing high rates of homelessness.¹⁸

Question: It is a well-known fact that currently, fewer than one quarter of those eligible for Housing Choice Vouchers receive them. The need for more help is great. Some researchers have found that Public Housing Agencies are forced to spend a lot on administrative costs, and paper vouchers can create more cost burden for these agencies. How can we bolster this program, not only by expanding access to vouchers, but also by modernizing it so that it can help more consumers?

¹⁷ Flaming, D., et al. (2015). "Home Not Found: The Cost of Homelessness in Silicon Valley." prepared for the County of Santa Clara,

https://www.sccgov.org/sites/osh/ContinuumofCare/ReportsandPublications/Documents/Santa%20Clara%20County%20CostStudyReport.pdf

¹⁶ Turner, M. A. (2003). Strengths and weaknesses of the housing voucher program. http://webarchive.urban.org/publications/900635.html

¹⁸ Levin, M. (January, 2020). "You've just been named California's homelessness czar — what's your first move?" CalMatters.

https://calmatters.org/housing/2020/01/california-homelessness-czar-options-ratings-cost-efficiency/



First, update and refine HUD's process for setting Fair Market Rents. Fair Market Rents set the maximum level for rents allowed under the voucher program. HUD calculates these rents every year at the county level, but the process is ill-equipped to address markets with rapidly rising or dropping rents, nor has it served markets with significant rent variation at the sub-county level. Set the rents too high and program costs can increase significantly (as well as push rents upward), but if they are set too low, households will be unable to find adequate units or be constrained to living in poorly resourced neighborhoods. HUD's Small Area Fair Market Rent demonstration, which calculates fair market rents at the zip code instead of the county level, holds important lessons for improvements in FMR calculations, and current research efforts by HUD to investigate methods for increasing the accuracy and timeliness of the FMR setting process are critical to continue and expand. ¹⁹ ²⁰

Second, make the current housing quality standard program less onerous for owner participation. The voucher program currently requires that landlords must meet a minimally acceptable level of physical quality for participating units. These housing quality standards can be a major challenge to owner participation and can cause a time delay such that a voucher holding household falls out of the program. HUD must improve its ability to quickly resolve housing quality standards, by employing technology solutions such as video inspections or random sampling to lower the bar to participation -- differentiating minor issues from more profound health and safety issues. Pushing for significant upgrades can force units and/or owners out of the program, particularly in cases where Fair Market Rents are close to existing market rents. The federal government should instead support local governments in building out their own building code inspection capacity in order to more broadly serve the housing market and protect renters.

Third, mandate minimal capacity standards for voucher administering entities and have new vouchers administered by the same entities that are overseeing state and local affordable housing programs wherever possible. The current system requires HUD to work through thousands of voucher-administering public housing authorities (PHAs) to implement the voucher program. Many of these are low capacity, with inadequate technology platforms, and don't otherwise engage in new housing construction. Ensuring PHAs that do administer vouchers have quality staffing and robust systems in place to monitor and manage new vouchers is critical. In addition, today PHAs often sit outside of the mainstream affordable housing capital subsidy delivery structure, meaning that opportunities to couple vouchers with production-based subsidies for greater impact are lost. HUD must have the

_

¹⁹ Reina, V., Acolin, A., & Bostic, R. W. (2019). Section 8 vouchers and rent limits: Do small area fair market rent limits increase access to opportunity neighborhoods? An early evaluation. Housing Policy Debate, 29(1), 44-61. https://doi.org/10.1080/10511482.2018.1476897
Peina, V. J. (2019). Do Small Area Fair Market Rents Reduce Racial Disparities in the

Voucher Program?. Housing Policy Debate, 29(5), 820-834. https://doi.org/10.1080/10511482.2018.1476897



flexibility to allocate new vouchers to state or regional governments, or other non-traditional entities such as community development financial institutions or project based rental assistance contract administrators, in order to better coordinate tenant based assistance with other efforts to address gaps in affordable housing.

Question: Are there any specific recommendations you may have that will optimize the program's efficiency to help reach even more potential recipients?

Yes, first, make it harder to directly or indirectly discriminate against voucher holders seeking to rent housing. Today in much of the country it is permitted to discriminate against voucher holders without penalty. And, even in states and jurisdictions where voucher non-discrimination laws are now formally in place (such as California), landlords are able to sidestep that obligation to rent to voucher-holding households by imposing high security deposit amounts, credit standards, and/or by listing their units at rents just above the Fair Market Rent. The bipartisan Choice in Affordable Housing Bill, authored by Senators Coons and Kramer offers a number of fixes to these issues, including providing landlords with signing bonuses and better aligning financial incentives for voucher administering entities.

Second, invest heavily in renter counseling and landlord outreach. Today, inadequate marketing to landlords, along with little support for them in understanding the mechanics of the voucher programs or their legal obligations greatly limit uptake. Scalable models exist with high-performing public housing authorities. Similarly, a significant expansion of renter counseling for renters who receive vouchers to help them better understand their rights and options has been shown to greatly increase the likelihood of timely leasing and geographic mobility.²¹

Third, prioritize the most vulnerable populations as we undertake expansions toward universal vouchers. This includes requiring that new vouchers be prioritized for formerly homeless populations or other vulnerable or extremely low income populations, in alignment wherever possible with state and local affordable housing programs. And this may also include priorities for other special populations that align with other areas of capital investment where vouchers can be beneficially project based, such as individuals with disabilities, youth aging out of foster care, the elderly, or those with extremely low-incomes living in communities at risk of displacement who can't otherwise be readily housed within LIHTC developments.

Fourth, accompany voucher expansion with a targeted renters tax credit for those low income households who are approaching a phase-out of eligibility for rental assistance as their incomes rise. Expanded voucher assistance should be

²¹ See, eg, Peter Bergman, Raj Chetty, et al. (March, 2020) Creating Moves to Opportunity: Experimental Evidence on Barriers to Neighborhood Choice. https://opportunityinsights.org/wp-content/uploads/2019/08/cmto_paper.pdf



paired with a renters tax credit for those with low to moderate incomes who still struggle with housing burdens. Creating a targeted tax credit could ensure expanded assistance avoids the twin challenges of the "subsidy cliff" and asset limits, where renters lose their assistance if their income goes above a certain level and where they are prohibited from building savings that can facilitate greater economic mobility. Research has shown that these cliffs can serve as a disincentive to work, particularly when even moderate incomes are insufficient to cover the gap between subsidized and market rents. Enacting a renter's tax credit targeted at working households who earn low incomes yet still face high housing cost burdens would create a more robust ladder of housing opportunity. This type of credit could support transitions out of rental assistance and potentially into affordable, entry-level homeownership, if those renters were able to accumulate more savings for a down payment. Lastly, while the existing operational complexity of vouchers may be a worthwhile trade-off for very-low or extremely low-income households, that complexity may be harder to justify if and as more vouchers are made available to those earning between 50-80% of area median income, especially when the share of rent those households can afford approaches the fair market rent standard in their jurisdictions. In these cases, the tenant share of rent may substantially outweigh HUD's share of rent. At a certain point, that relatively modest benefit may become too cumbersome to justify, either from a renter or landlord's perspective.

Fifth, pair vouchers with a robust production-oriented strategy. Broader purchasing power by a growing number of voucher holding households risks further driving up rents, which could lead to higher program costs and greater housing cost burdens for non-voucher holding households. Addressing constraints to housing supply at the lower end of the market is therefore paramount for avoiding market distortions, especially where supply is most constrained, and to make sure the housing stock that is coming online creates access to a diverse array of communities and in ways that support climate imperatives and racial equity. This requires the federal government to work constructively with local governments to do away with exclusionary housing policies and local regulatory barriers. It also requires a larger share of new housing vouchers, whose rents would be pegged to market rents, to be project based into new rental housing communities. For traditional affordable housing, including permanent supportive housing, the additional commercial debt facilitated through project based vouchers is already used to close funding gaps that otherwise complicate the production of new low income tax credit funded affordable housing, particularly in higher cost markets. But an expanded voucher program should also be used to spur otherwise market-rate construction to take on project based vouchers for a share of their units, enabling such developments to offer mixed-income housing while financing against the voucher enabled revenue stream. By functionally de-risking a share of a multifamily market-rate project's forecasted rental revenue, a voucher expansion could stimulate construction of new housing, particularly if paired with expanded federal investment into shallow subsidy programs such as those used by market rate developers, including the tax-exempt bond program, the



Federal Housing Administration's 221d4 or 236 programs, and/or a more aggressive set of debt products that might be made available by Fannie Mae and Freddie Mac. Programs like these require less regulatory oversight than traditional affordable housing capital programs, are available "over the counter", and cost far less on a subsidy per unit basis. By leveraging commercial debt secured by project based voucher revenue, more expensive deep capital subsidy sources can be avoided, while still achieving the same depth of affordability for the residents of those project based voucher units.

Question: Would providing housing vouchers in the form of an EBT card be beneficial in improving financial literacy for underbanked consumers, especially those who haven't had the opportunity to use a debit card?

To my knowledge no research has been done to evaluate the potential impact of EBT use in place of traditionally-provided housing vouchers. That is definitely an interesting line of inquiry that deserves further attention and exploration.

Question: Cultural and language barriers exist for a lot of low-income individuals who would qualify for these programs. While HUD has resources for serving these individuals, my concerns is that it may not be enough. Can you describe any gaps you're seeing in how HUD is able to work with Limited English Proficiency (LEP) individuals? What resources may be lacking that could better help HUD assist these populations?

Compared to the overwhelming amount of research conducted on limited english proficiency leading to substandard health care in the United States, there is a dearth of research in the housing assistance domain. However, we do know anecdotally that LEP individuals are without question disadvantaged in this system. LEP tenants may lack interpreters at every stage of the process, most harmfully in the case of a subsidy termination hearing wherein they are unable to defend their subsidy. There is also often undocumented, but well-known discriminatory practices within the housing voucher system, with landlords refusing to rent to LEP applicants. While there are federal laws in place, including the Fair Housing Act, which prevent housing providers from refusing to rent to applicants based on their English proficiency or national origin, there are many reasons a housing provider can give for refusing to rent to an individual that will allow them to circumvent these protections. Looking past HUD, Public Housing Authorities (PHAs) often do not have plans to assist LEP applicants, and even if they do, they do not always follow plans they have set forth.²² Equipping PHAs with tools to provide needed services to LEP individuals, strengthening enforcement of anti-discriminatory housing laws in place, and investing in both better outreach and interpreter services for LEP

-

²² National Housing Law Project.

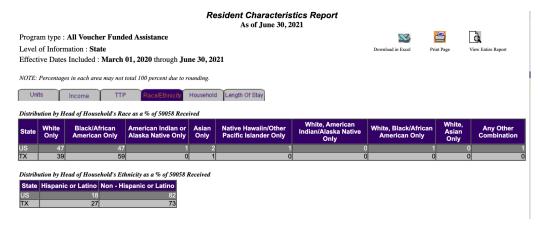
https://www.nhlp.org/initiatives/fair-housing-housing-for-people-with-disabilities/language-access/



individuals are critical steps toward assisting LEP individuals who are entitled to housing vouchers.

Question: Please provide any data or supplementary research you may have that evaluates the impact of language and cultural barriers on access to housing vouchers and other government assistance programs.

There is well known housing provider discrimination against LEP individuals. However due to the many reasons a housing provider can cite for refusing to rent to an individual, formal research on the topic is hard to come by. HUD provides a <u>residential characteristic report</u> function - including a snapshot below - to view the demographics of those who are receiving housing assistance, though it does not include primary language.



While not housing related, the following studies show limited english proficiency hampers individuals,' and families,' ability to receive public healthcare assistance and is often associated with poorer health outcomes relative to native-English speakers.

- Language Barriers to Health Care Access among Medicare Beneficiaries
- <u>Limited English Proficiency, Primary Language at Home, and</u>
 <u>Disparities in Children's Health Care: How Language Barriers are</u>
 Measured Matters
- Lost in translation: impact of language barriers on children's healthcare
- The impact of language barriers on the health care of Latinos in the United States: a review of the literature and guidelines for practice

Lastly, the threat of deportation is a major barrier to individuals with immigrant family members in terms of accessing public assistance.²³ The chilling effect has been particularly well documented in terms of accessing medical care that families are eligible for, but it likely extends to all arms of government assistance.

https://ccf.georgetown.edu/2020/07/02/new-report-finds-chilling-effect-avoidance-of-health-care-services-among-immigrant-families/

²³ Whitener, K. (July, 2020). "New Report Finds Chilling Effect, Avoidance of Health Care Services Among Immigrant Families." Georgetown University Health Policy Institute: Center for CHildren and Families.



Question: It is a well-known fact that currently, fewer than one quarter of those eligible for Housing Choice Vouchers receive them. The need for more help is great. Some researchers have found that Public Housing Agencies are forced to spend a lot on administrative costs, and paper vouchers can create more cost burden for these agencies. How can we bolster this program, not only by expanding access to vouchers, but also by modernizing it so that it can help more consumers?

First, update and refine HUD's process for setting Fair Market Rents. Fair Market Rents set the maximum level for rents allowed under the voucher program. HUD calculates these rents every year at the county level, but the process is ill-equipped to address markets with rapidly rising or dropping rents, nor has it served markets with significant rent variation at the sub-county level. Set the rents too high and program costs can increase significantly (as well as push rents upward), but if they are set too low, households will be unable to find adequate units or be constrained to living in poorly resourced neighborhoods. HUD's Small Area Fair Market Rent demonstration, which calculates fair market rents at the zip code instead of the county level, holds important lessons for improvements in FMR calculations, and current research efforts by HUD to investigate methods for increasing the accuracy and timeliness of the FMR setting process are critical to continue and expand.²⁴ ²⁵

Second, make the current housing quality standard program less onerous for owner participation. The voucher program currently requires that landlords must meet a minimally acceptable level of physical quality for participating units. These housing quality standards can be a major challenge to owner participation and can cause a time delay such that a voucher holding household falls out of the program. HUD must improve its ability to quickly resolve housing quality standards, by employing technology solutions such as video inspections or random sampling to lower the bar to participation -- differentiating minor issues from more profound health and safety issues. Pushing for significant upgrades can force units and/or owners out of the program, particularly in cases where Fair Market Rents are close to existing market rents. The federal government should instead support local governments in building out their own building code inspection capacity in order to more broadly serve the housing market and protect renters.

Third, mandate minimal capacity standards for voucher administering entities and have new vouchers administered by the same entities that are overseeing state and local affordable housing programs wherever possible. The current

²⁴ Reina, V., Acolin, A., & Bostic, R. W. (2019). Section 8 vouchers and rent limits: Do small area fair market rent limits increase access to opportunity neighborhoods? An early evaluation.

Housing Policy Debate, 29(1), 44-61. https://doi.org/10.1080/10511482.2018.1476897
²⁵ Reina, V. J. (2019). Do Small Area Fair Market Rents Reduce Racial Disparities in the Voucher Program?. Housing Policy Debate, 29(5), 820-834. https://doi.org/10.1080/10511482.2018.1476897



system requires HUD to work through thousands of voucher-administering public housing authorities (PHAs) to implement the voucher program. Many of these are low capacity, with inadequate technology platforms, and don't otherwise engage in new housing construction. Ensuring PHAs that do administer vouchers have quality staffing and robust systems in place to monitor and manage new vouchers is critical. In addition, today PHAs often sit outside of the mainstream affordable housing capital subsidy delivery structure, meaning that opportunities to couple vouchers with production-based subsidies for greater impact are lost. HUD must have the flexibility to allocate new vouchers to state or regional governments, or other non-traditional entities such as community development financial institutions or project based rental assistance contract administrators, in order to better coordinate tenant based assistance with other efforts to address gaps in affordable housing.

Question: Are there any specific recommendations you may have that will optimize the program's efficiency to help reach even more potential recipients?

Yes, first, make it harder to directly or indirectly discriminate against voucher holders seeking to rent housing. Today in much of the country it is permitted to discriminate against voucher holders without penalty. And, even in states and jurisdictions where voucher non-discrimination laws are now formally in place (such as California), landlords are able to sidestep that obligation to rent to voucher-holding households by imposing high security deposit amounts, credit standards, and/or by listing their units at rents just above the Fair Market Rent. The bipartisan Choice in Affordable Housing Bill, authored by Senators Coons and Kramer offers a number of fixes to these issues, including providing landlords with signing bonuses and better aligning financial incentives for voucher administering entities.

Second, invest heavily in renter counseling and landlord outreach. Today, inadequate marketing to landlords, along with little support for them in understanding the mechanics of the voucher programs or their legal obligations greatly limit uptake. Scalable models exist with high-performing public housing authorities. Similarly, a significant expansion of renter counseling for renters who receive vouchers to help them better understand their rights and options has been shown to greatly increase the likelihood of timely leasing and geographic mobility.²⁶

Third, prioritize the most vulnerable populations as we undertake expansions toward universal vouchers. This includes requiring that new vouchers be prioritized for formerly homeless populations or other vulnerable or extremely low income populations, in alignment wherever possible with state and local affordable housing programs. And this may also include priorities for other

²⁶ See, eg, Peter Bergman, Raj Chetty, et al. (March, 2020) Creating Moves to Opportunity: Experimental Evidence on Barriers to Neighborhood Choice. https://opportunityinsights.org/wp-content/uploads/2019/08/cmto_paper.pdf



special populations that align with other areas of capital investment where vouchers can be beneficially project based, such as individuals with disabilities, youth aging out of foster care, the elderly, or those with extremely low-incomes living in communities at risk of displacement who can't otherwise be readily housed within LIHTC developments.

Fourth, accompany voucher expansion with a targeted renters tax credit for those low income households who are approaching a phase-out of eligibility for rental assistance as their incomes rise. Expanded voucher assistance should be paired with a renters tax credit for those with low to moderate incomes who still struggle with housing burdens. Creating a targeted tax credit could ensure expanded assistance avoids the twin challenges of the "subsidy cliff" and asset limits, where renters lose their assistance if their income goes above a certain level and where they are prohibited from building savings that can facilitate greater economic mobility. Research has shown that these cliffs can serve as a disincentive to work, particularly when even moderate incomes are insufficient to cover the gap between subsidized and market rents. Enacting a renter's tax credit targeted at working households who earn low incomes yet still face high housing cost burdens would create a more robust ladder of housing opportunity. This type of credit could support transitions out of rental assistance and potentially into affordable, entry-level homeownership, if those renters were able to accumulate more savings for a down payment. Lastly, while the existing operational complexity of vouchers may be a worthwhile trade-off for very-low or extremely low-income households, that complexity may be harder to justify if and as more vouchers are made available to those earning between 50-80% of area median income, especially when the share of rent those households can afford approaches the fair market rent standard in their jurisdictions. In these cases, the tenant share of rent may substantially outweigh HUD's share of rent. At a certain point, that relatively modest benefit may become too cumbersome to justify, either from a renter or landlord's perspective.

Fifth, pair vouchers with a robust production-oriented strategy. Broader purchasing power by a growing number of voucher holding households risks further driving up rents, which could lead to higher program costs and greater housing cost burdens for non-voucher holding households. Addressing constraints to housing supply at the lower end of the market is therefore paramount for avoiding market distortions, especially where supply is most constrained, and to make sure the housing stock that is coming online creates access to a diverse array of communities and in ways that support climate imperatives and racial equity. This requires the federal government to work constructively with local governments to do away with exclusionary housing policies and local regulatory barriers. It also requires a larger share of new housing vouchers, whose rents would be pegged to market rents, to be project based into new rental housing communities. For traditional affordable housing, including permanent supportive housing, the additional commercial debt facilitated through project based vouchers is already used to close funding gaps that otherwise complicate the production of new low income tax credit funded



affordable housing, particularly in higher cost markets. But an expanded voucher program should also be used to spur otherwise market-rate construction to take on project based vouchers for a share of their units, enabling such developments to offer mixed-income housing while financing against the voucher enabled revenue stream. By functionally de-risking a share of a multifamily market-rate project's forecasted rental revenue, a voucher expansion could stimulate construction of new housing, particularly if paired with expanded federal investment into shallow subsidy programs such as those used by market rate developers, including the tax-exempt bond program, the Federal Housing Administration's 221d4 or 236 programs, and/or a more aggressive set of debt products that might be made available by Fannie Mae and Freddie Mac. Programs like these require less regulatory oversight than traditional affordable housing capital programs, are available "over the counter", and cost far less on a subsidy per unit basis. By leveraging commercial debt secured by project based voucher revenue, more expensive deep capital subsidy sources can be avoided, while still achieving the same depth of affordability for the residents of those project based voucher units.

Question: Would providing housing vouchers in the form of an EBT card be beneficial in improving financial literacy for underbanked consumers, especially those who haven't had the opportunity to use a debit card?

To my knowledge no research has been done to evaluate the potential impact of EBT use in place of traditionally-provided housing vouchers. That is definitely an interesting line of inquiry that deserves further attention and exploration.

Question: Cultural and language barriers exist for a lot of low-income individuals who would qualify for these programs. While HUD has resources for serving these individuals, my concerns is that it may not be enough. Can you describe any gaps you're seeing in how HUD is able to work with Limited English Proficiency (LEP) individuals? What resources may be lacking that could better help HUD assist these populations?

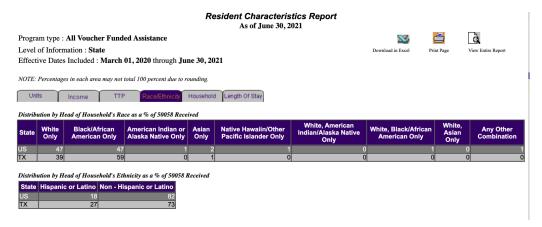
Compared to the overwhelming amount of research conducted on limited english proficiency leading to substandard health care in the United States, there is a dearth of research in the housing assistance domain. However, we do know anecdotally that LEP individuals are without question disadvantaged in this system. LEP tenants may lack interpreters at every stage of the process, most harmfully in the case of a subsidy termination hearing wherein they are unable to defend their subsidy. There is also often undocumented, but well-known discriminatory practices within the housing voucher system, with landlords refusing to rent to LEP applicants. While there are federal laws in place, including the Fair Housing Act, which prevent housing providers from refusing to rent to applicants based on their English proficiency or national origin, there are many reasons a housing provider can give for refusing to rent to an individual that will allow them to circumvent these protections. Looking



past HUD, Public Housing Authorities (PHAs) often do not have plans to assist LEP applicants, and even if they do, they do not always follow plans they have set forth.²⁷ Equipping PHAs with tools to provide needed services to LEP individuals, strengthening enforcement of anti-discriminatory housing laws in place, and investing in both better outreach and interpreter services for LEP individuals are critical steps toward assisting LEP individuals who are entitled to housing vouchers.

Question: Please provide any data or supplementary research you may have that evaluates the impact of language and cultural barriers on access to housing vouchers and other government assistance programs.

There is well known housing provider discrimination against LEP individuals. However due to the many reasons a housing provider can cite for refusing to rent to an individual, formal research on the topic is hard to come by. HUD provides a <u>residential characteristic report</u> function - including a snapshot below - to view the demographics of those who are receiving housing assistance, though it does not include primary language.



While not housing related, the following studies show limited english proficiency hampers individuals,' and families,' ability to receive public healthcare assistance and is often associated with poorer health outcomes relative to native-English speakers.

- Language Barriers to Health Care Access among Medicare Beneficiaries
- Limited English Proficiency, Primary Language at Home, and Disparities in Children's Health Care: How Language Barriers are Measured Matters
- Lost in translation: impact of language barriers on children's healthcare
- The impact of language barriers on the health care of Latinos in the United States: a review of the literature and guidelines for practice

_

²⁷ National Housing Law Project.

https://www.nhlp.org/initiatives/fair-housing-housing-for-people-with-disabilities/language-access/



Lastly, the threat of deportation is a major barrier to individuals with immigrant family members in terms of accessing public assistance. The chilling effect has been particularly well documented in terms of accessing medical care that families are eligible for, but it likely extends to all arms of government assistance.

Sincerely,

Ben Metcalf

Managing Director

²⁸ Whitener, K. (July, 2020). "New Report Finds Chilling Effect, Avoidance of Health Care Services Among Immigrant Families." Georgetown University Health Policy Institute: Center for CHildren and Families.

 $\underline{https://ccf.georgetown.edu/2020/07/02/new-report-finds-chilling-effect-avoidance-of-health-car}\\ \underline{e-services-among-immigrant-families/}$