

The Future of Public Housing

Confronting the Challenges Facing the Public Housing Program

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Will Fischer center on budget and policy priorities

May 2020

In October 2019, the Urban Institute and the Center on Budget and Policy Priorities launched the Future of Public Housing Initiative. The initiative's goal is to identify points of consensus and divergence on the issues that must be addressed to preserve and improve the public housing program and to develop an actionable policy agenda. The initiative kicked off with a convening of practitioners, policymakers, and public housing residents—the latter a group often omitted from policy discussions—to share viewpoints on the state of public housing, including challenges and priority areas for change. The agenda for the day was informed by data analysis and 15 interviews conducted with public housing residents, public housing authority (PHA) and industry representatives, nonprofit housing developers, and congressional staff members.

This brief first summarizes public housing's key issues, which served as the backdrop for the discussion. It then synthesizes the viewpoints of event attendees, acknowledging points of consensus and disagreement. A final section outlines next steps for developing policy guidance for practitioners and policymakers.

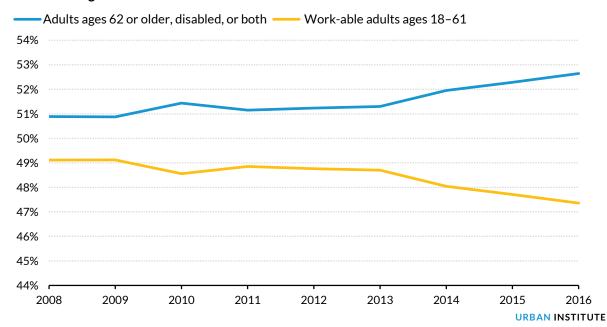
The State of Public Housing

Public housing has been an important source of permanent affordable housing for low-income families, people with disabilities, and older adults since its inception in 1937 and is the nation's oldest rental housing assistance program. Public housing serves households earning up to 80 percent of the area median income, the majority of which pay 30 percent of their income in rent. As of 2019, a dispersed

network of approximately 3,000 local PHAs owned and managed close to 900,000 units that housed around 2 million people.¹

The families living in public housing include some of the most vulnerable in the nation. Average annual household income for public housing residents was just \$15,738 in 2019, and roughly 72 percent of households had incomes below 30 percent of area median income that year.² An Urban Institute analysis using 2016 data found that about 30 percent of all households living in public housing included children. As figure 1 shows, since 2008, more than 50 percent of the heads of public housing households have been 62 or older and/or had a disability, and that share has been growing (Docter and Galvez 2020).

FIGURE 1





Source: US Department of Housing and Urban Development.

As millions of low-income renters struggle to afford housing, public housing remains an important resource and source of stability. Currently, in no US county can a minimum-wage earner afford a standard two-bedroom home, and rents have grown considerably faster than renters' incomes over the past two decades.³ Housing assistance for homeless, rent-burdened, or extremely low-income people (households with incomes at or below 30 percent of area median income) is scarce, and assistance is provided to only about 1 in 5 eligible households (Kingsley 2017). Public housing represents approximately 10 percent of all affordable housing available to extremely low-income renters (Getsinger et al. 2017). And yet in many communities, waiting lists for public housing and other rental assistance programs are years long or closed to new applicants (Kingsley 2017).

The Challenges Facing Public Housing

The public housing program faces several challenges related to the physical condition of the properties and residents' needs, including dilapidated units that can pose health and safety risks, inadequate replacement and relocation policies in cases where units must be redeveloped, and a lack of resources for addressing capital improvements or resident services.

As the public housing stock has aged, its maintenance needs have grown. The majority of public housing properties (78 percent) underwent their last construction before 1997, and 42 percent were constructed before 1975 (Docter and Galvez 2020). Public housing properties renovated or replaced more recently—such as the roughly 300 properties funded through the Choice Neighborhoods initiative and the HOPE VI program, both of which targeted severely distressed properties, and units converted through the Rental Assistance Demonstration (RAD) program—may be in good condition and have minimal capital needs. But other properties, at both large and small PHAs, will require major renovation or complete replacement to remain viable.

For example, the New York City Housing Authority estimates that it has a \$32 billion capital needs backlog to address the needs of its aging buildings, most of which are complex high-rise structures (STV AECOM PNA 2018). Likewise, the District of Columbia Housing Authority estimates that restoring its properties will take more than \$2 billion.⁴ Smaller agencies, like those in Cairo and East St. Louis, Illinois, are facing painful choices about what to do when raising the funds to restore or replace their public housing communities becomes impossible, leaving them with the hard reality of closing buildings.⁵ More than 200,000 public housing units have been lost since the 1990s, excluding units that were replaced or converted to other programs.⁶

Given the poor condition of some public housing properties, preserving units will require some residents to face temporary or permanent relocation as properties undergo repairs and renovation. Ideally, most will be planned relocations, with the time to minimize disruptions and engage residents. However, poor conditions increase the risk of fires, plumbing problems, and other crises that may force emergency relocations. And with 9 percent of units in 100- or 500-year floodplains, the increasing occurrence of extreme weather events poses a significant risk to the public housing stock and makes emergency relocations more likely (Docter and Galvez 2020). Although all residents will need support, especially when there are emergency relocations, housing agencies need to be prepared to address the needs of older residents and those with disabilities, who are especially vulnerable to the stresses of involuntary relocation (Manjarrez, Popkin, and Guernsey 2007).

Residents of public housing properties that are demolished or sold are typically offered portable Housing Choice Vouchers, which help families afford housing in the private market. Vouchers are an effective form of assistance, and some families prefer them to public housing. But replacing public housing with vouchers can disrupt closely knit communities, and vouchers can be difficult to use in tight markets and areas with little available rental housing. For example, according to a report from ProPublica and the *Southern Illinoisan*, a scarcity of rental housing in Cairo, Illinois, and nearby Thebes meant that many tenants displaced from public housing had to use their vouchers in communities an hour away.⁷

Finally, a persistent challenge for preserving public housing is the program's legacy of racial segregation and economic isolation. Many properties are in neighborhoods with high poverty rates and a history of disinvestment (Turner, Popkin, and Rawlings 2008). The average neighborhood poverty rate for public housing units (using census tracts as a proxy for neighborhoods) was 32 percent as of 2019. In comparison, the average rate was 23 percent for voucher locations, which is comparable to the average for low-income renters' neighborhoods generally.⁸

Preserving Public Housing Requires a Range of Strategies

Because PHAs operate in diverse contexts and housing markets and have different resident populations and organizational capacities, policies for preserving public housing must be effective in various contexts. For example, some larger PHAs in tight markets may be able to generate sizable rent revenues by selling properties, adding density, or adding units that target higher-income households to their public housing communities. Some PHAs have sophisticated asset management teams that can execute complex development deals. In contrast, PHAs in softer housing markets may struggle to attract private investment. Similarly, some PHAs may have resident services teams and offer supportive services on site, while others lack administrative capacity and will require substantial technical assistance to manage service efforts or execute complex financial deals.

Several core federal funding streams and programs are intended to maintain or replace public housing (see the appendix for a summary of programs and policies relevant to public housing), and although some have shown promising early results, they have thus far been insufficient. Meeting the needs of the public housing program and ensuring resident well-being will require a combination of new funding, an understanding of the successes and challenges of existing policy tools, and new policy solutions. Importantly, the field needs consensus among diverse stakeholders about the urgent need for action.

Developing an Evidence-Based Policy Agenda

More than 60 stakeholders—including officials from the US Department of Housing and Urban Development (HUD), researchers, advocates, philanthropic funders, public housing resident leaders, and industry representatives—attended the Future of Public Housing convening. The day began with a discussion of the group's values and priorities, based on statements collected from attendees before the convening. The statements, excerpted in this brief, grounded the day's conversations in shared beliefs centered on the importance of providing high-quality, affordable housing to low-income families and of ensuring housing stability and access to opportunity.

Brief presentations followed on the condition of the public housing stock and the characteristics of tenants, early outcomes from the RAD⁹ program, and the policy tools and strategies available for

preserving and replacing units (see the appendix). The presentations provided attendees with a common framework to support the day's conversations.

It is important to preserve, increase, and adequately maintain the stock of deeply subsidized housing because it serves some of America's lowest-income households, provides critical stability for vulnerable families, and is often a key source for large and accessible units. The private market cannot and will not fill all of these needs. —Future of Public Housing convening attendee

The remainder of the day was dedicated to two rounds of facilitated group discussions, with attendees assigned to tables with representatives from different stakeholder groups. The main themes for discussion—how to deliver high quality and affordability through the public housing program and confront public housing's legacy of segregation and disinvestment—were drawn from the stakeholder interviews conducted before the convening. Table leaders facilitated the conversations and solicited participant reflections. The event concluded with an agenda-building session that highlighted cross-cutting observations and takeaways from the group discussions.

What We Learned

The discussions surfaced areas of agreement and disagreement, as well as topics for further exploration. Common discussion themes included the following:

- Public housing is a vital resource, and ensuring that the same number of deeply subsidized units—or more—remain available for extremely low-income households is important.
- Additional resources are critically needed to preserve and revitalize public housing.
- PHAs must be held accountable to HUD and local stakeholders, but they also need sufficient policy flexibility to operate effectively in diverse local contexts. Federal policy should balance these goals.
- Residents should have a meaningful role in renovation and redevelopment decisionmaking processes, especially on issues related to portfolio conversion and resident relocation.
- Special attention must be paid to the needs of the growing number of older adults living in public housing.

- Racial segregation and neighborhood disinvestment should be addressed through investments in public housing and surrounding communities, as well as through mobility options for residents who wish to relocate.
- Policymakers must act quickly to preserve public housing, both to protect PHA assets and to
 ensure that units are safe, comfortable, and accessible to a diversity of households.

We need more safe, supportive, and healthy housing affordable to extremely low-income people because it is intolerable to leave millions, including kids, seniors, and disabled persons and workers, without a decent place to live and thrive. —Future of Public Housing convening attendee

Public Housing Is a Vital Resource

Attendees agreed that public housing plays an essential role in the rental housing market and that strong policy tools are needed to preserve and maintain it. As one person noted, public housing is uniquely grounded in a public mission: in addition to providing stability for residents and communities, public housing is characterized by public ownership and accountability. Several attendees reflected that public ownership and control of land and property are important aspects of public housing that set it apart from other subsidized housing programs and merit safeguarding. Others reflected that public ownership ensures permanent affordability and protects against the fluctuations in the private market and among its actors.

Similarly, funders, HUD staff members, advocates, local policymakers, residents, researchers, and other stakeholders expressed interest in strengthening the tools available to PHAs to preserve units and keep them in public ownership. Several groups of participants identified the need to strengthen the RAD conversion process to ensure public control and long-term affordability. Several PHA and industry representatives added that RAD should be adapted for agencies that have struggled to execute deals because of a lack of capital funding.

More Resources Are Needed to Preserve and Revitalize Public Housing

Participants noted that existing policy tools do not provide sufficient resources to meet the needs of public housing and its residents. Additional funds are needed both to address unmet public housing renovation needs and to ensure that properties can be appropriately maintained going forward.

Participants identified options for providing additional funds and other resources, such as increased capital grants, reforms to the Public Housing Capital Fund (the federal funding stream that supports

renovations and capital improvements to public housing properties), supplements to subsidies provided under RAD, additional funds for the Choice Neighborhoods initiative, and additional Low-Income Housing Tax Credits targeted to preserving public housing. Some participants noted that housing agencies should have access to various funding mechanisms because some may not be effective in certain market conditions. And some PHA directors and industry representatives noted that some agencies, including many small PHAs, need capacity-building support and technical assistance to facilitate successful conversion strategies, particularly to use more complicated approaches such as tax credit and debt financing.

Flexibility and Accountability Should Be Balanced

The degree of flexibility that PHAs should have to make policy and financial decisions was a significant point of disagreement. Participants generally agreed that HUD should hold PHAs accountable for maintaining unit quality, healthy financial status, tenant rights and protections, and other performance metrics. However, some argued that PHAs needed greater autonomy and regulatory and financial flexibility to respond effectively to local market conditions. Others called for maintaining and bolstering restrictions on PHAs in some areas—for example, to better protect residents against rent increases and displacement and to ensure that properties remain affordable long term.

Under current requirements, PHAs have flexibility with many aspects of program administration but must comply with federal rules in other areas and report annually to HUD on several financial, household, and program-level measures. Although some HUD officials emphasized the importance of rigorous unit inspection protocols and many advocates and residents argued that tenant protections should be maintained or strengthened, some PHA directors and industry representatives expressed frustration with the strain that data collection and reporting can place on limited resources, particularly for small housing authorities.

Several discussion groups concluded that a balancing of oversight with flexibility is needed so that PHAs can pursue strategies that reflect local contexts and conditions. But the discussion stopped short of identifying where flexibility should be expanded and where tighter accountability and protections are needed.

Residents Should Have a Meaningful Role in Decisionmaking Processes

Most participants agreed that residents should be involved in decisionmaking processes at the local and federal levels. Several resident leaders expressed frustration that residents are often brought to the table after decisions have been made and encouraged housing authority leaders and HUD to involve residents earlier. Several groups of attendees confirmed that residents have a stake in decisions regarding public-private partnerships and ownership, tenant rights to return to units after redevelopment, and tenant screening and reentry policies and should be meaningfully involved in these discussions.

PHAs' redevelopment and planning processes must acknowledge that the most committed "shareholders" in any public housing development are the people who live there. If the goal is to ensure that the redevelopment process is sensitive to each community, there is no substitute for resident empowerment in decisionmaking processes. One resident leader noted that not all preservation strategies work in all situations and that residents should be involved in determining which preservation strategy works best for the community.

Lastly, attendees highlighted the need to more effectively serve residents and communicate about who lives in public housing. Some expressed concern that the current narrative surrounding public housing is one of failure and that building support will require a large shift in the public framing. One group discussed the existing narrative that public housing communities are not worth investing in as a self-fulfilling prophecy that exempts society from its responsibility to address the most pressing problems. Many participants concluded that to elicit action, all stakeholders have a role in promoting a shift in public and political opinion about public housing.

We need more public housing because of the nation's growing affordability crisis, and every unit that is lost threatens instability for low-income families, elderly and disabled persons. —Future of Public Housing convening attendee

Addressing the Needs of Older Adults and People with Disabilities

Discussions of resident engagement also raised issues surrounding residents' service needs during renovation or relocation, when older adults and other vulnerable populations may require unique supports or considerations. Resident leaders expressed concerns about the stress that relocation places on residents of all ages, but particularly among older and frail residents for whom relocation poses serious health risks.¹⁰ Resident leaders emphasized the importance of the development of trust between housing authority leaders and residents to ensure successful relocation, especially among those with greater needs.

Likewise, PHA directors requested additional resources to help address the multifaceted challenges that older and frail residents face, highlighting a gap in federal funding and policy. One federal official noted that often, older residents' only programming is available through the Resident Opportunities and Self-Sufficiency program, which is intended to provide services for public housing residents of all ages. However, the program's funding is awarded on a competitive basis, so not all housing agencies have even that resource available. And because it is tied to the public housing program, the Resident Opportunities and Self-Sufficiency program funding is lost in the RAD conversion process. As the average age of household heads trends upward, attention will need to be targeted to the needs of older and disabled residents. Abandoning public housing and displacing public housing residents will continue our nation's pattern of implementing housing policies that perpetuate racial segregation. —Future of Public Housing convening attendee

Confronting Racial Segregation and Neighborhood Disinvestment

Structural racism and racial segregation were inherent in the creation and development of public housing, and the effects persist today. Attendees agreed that we face many challenges in devising strategies to tackle structural racism in the current political environment. Existing tools include the Fair Housing Act and the Affirmatively Furthering Fair Housing rule, which is currently at risk (Greene et al. 2020; Solari et al. 2020). Other programs and strategies, such as Choice Neighborhoods, aim to address the effects of red-lining, de facto and de jure segregation, and inequitable development patterns, but they reach a small number of communities and cannot alone make up for decades of racially motivated disinvestment and neglect.

Attendees were unanimous in their support of Affirmatively Furthering Fair Housing requirements, and most supported provisions "with teeth"—arguing that they are necessary to facilitate investment in high-poverty areas. However, there was some disagreement around the extent to which PHAs, especially small and underresourced agencies, should be held accountable for executing local Affirmatively Furthering Fair Housing goals. One PHA director noted that society would be worse off without fair housing requirements, while other directors and industry leaders argued that fair housing regulations require too much of PHAs, especially those with few resources.

There was, however, widespread agreement that fair housing laws and regulations in their current form are insufficient to combat historical and ongoing racial segregation and racism. Residents, advocates, housing authority directors, and industry representatives alike argued that absent additional resources, fair housing laws cannot fulfill their mission of undoing entrenched segregation. Attendees said strong neighborhood mobility options—for example, housing vouchers coupled with supportive services—should go hand in hand with investment in neighborhoods that contain public housing. Revitalizing public housing properties in distressed neighborhoods while ensuring that residents have access to opportunity-rich environments will likely require a community investment approach like Choice Neighborhoods, which encourages public and private investment in the communities surrounding public housing along with renovation or replacement of properties themselves (Pendall et al. 2015). Residents who wish to move to low-poverty neighborhoods should be able to do so, while those who wish to remain should benefit from a robust place-based approach. Attendees recognized that residents who opt to use vouchers to move to new neighborhoods may face challenges (such as being far from families and friends in their communities of origin) and should be supported throughout the process. One group noted that policies should allow for group moves or relocations. In terms of new development and urban revitalization efforts, several attendees noted that racial equity should be at the center of planning to prevent gentrification and displacement of long-term residents and communities. Both residents and researchers noted that in expensive cities such as San Francisco, New York, and Boston, mobility and voucher options are limited by racial and "source of income" discrimination. In these contexts, new public housing developments or other unit-based housing subsidies are needed to prevent neighborhoods from growing more segregated. Many attendees noted that the process of rehabilitating and revitalizing public housing presents a rare opportunity to improve distressed urban neighborhoods without causing additional displacement. The provisions within the RAD program that enable residents to apply for a portable voucher after living in RAD-converted units for at least a year were also broadly popular with the stakeholders at the convening, so long as voucher assistance is a choice and residents retain the option to remain in public housing.

Next Steps

Participants in the convening expressed an urgent need for new energy and ideas to preserve public housing and support residents and emphasized that policymakers must act quickly to protect PHA assets and ensure that units are safe and accessible to a diversity of households. A single day of dialogue cannot fully capture the breadth of possible perspectives or delve into all the relevant topics. More work (discussion and data analysis) is needed to identify policy solutions and craft a new policy agenda for the public housing program. Urban and the Center on Budget and Policy Priorities are raising resources from a consortium of funders to support the Future of Public Housing Initiative in hosting additional convenings and developing research about public housing residents. The initiative will surface best practices for relocating and supporting vulnerable residents and include a communications strategy to reach decisionmakers.

The initiative will identify policy, practice, and federal funding recommendations for public housing, focusing on issues raised through our data analysis and discussions. This includes a review of past evaluations of programs such as Choice Neighborhoods, RAD, and HOPE VI to examine lessons learned across programs. To accomplish this goal, we are working to raise resources for additional convenings and surveys, each dedicated to a deeper understanding of one of the following topics:

- 1. identifying policy changes needed to continue making progress to preserve and revitalize public housing
- 2. updating recommendations regarding the funding need of PHAs to adequately operate and improve their public housing stock, especially in underinvested, neglected, and systematically segregated neighborhoods
- 3. ensuring that preservation strategies reflect resident voices, needs, and priorities
- 4. addressing the needs of older adults and people with disabilities

After each convening, we will produce a report that summarizes themes from the discussions and presents policy recommendations. The reports will be targeted to policymakers, advocates, practitioners, and resident groups. The ultimate goal is to generate targeted recommendations for the next Congress, for HUD, and for PHAs to implement.

Appendix. Federal Policies and Programs

Public Housing Operating Fund

Public housing operations are funded by the Public Housing Operating Fund, which provides PHAs with operating subsidies to maintain their public housing units. The operating fund has been deeply underfunded over the past two decades, averaging 93 percent of the amount that agencies are eligible for under a formula set by HUD (Center on Budget and Policy Priorities 2017).¹¹

Public Housing Capital Fund

The Public Housing Capital Fund, like the operating fund, is a key funding stream that HUD distributes to public housing agencies by formula each year. The capital fund supports the renovation of public housing developments and replacement of items such as appliances and heating and cooling equipment. This funding stream does not have an official full-funding amount, but funding levels over the past two decades have fallen far below the needs.¹²

Rental Assistance Demonstration (RAD)

HUD launched RAD to respond to the long-term capital needs shortfall for public housing. The program allows public housing authorities to convert public housing units to project-based Section 8 contracts (either to project-based vouchers, which are part of the Housing Choice Voucher Program, or to project-based rental assistance). In fiscal year 2018, the number of units able to convert through RAD was raised to 455,000 units, almost 45 percent of the country's public housing stock. RAD includes substantial tenant protections that other programs lack (Popkin 2020).

Demolition and Disposition, and Voluntary Conversion

Outside of RAD, housing authorities can remove projects from the public housing program in several ways, the most widely used of which are (1) "demolition and disposition," which allows agencies to demolish, sell, or transfer ownership of projects that they can show are obsolete and unsuitable as housing and cannot be rehabilitated in a cost-effective way, and (2) "voluntary conversion," which allows agencies to convert properties to vouchers if they can show it would not be more expensive than retaining the properties as public housing.¹³ Instead of converting the units to nonpublic housing, project-based subsidies as happens with RAD, housing agencies generally receive allocations of "tenant protection vouchers" to replace some, but usually not all, of the public housing subsidies. Agencies can choose to enter into "project-based contracts" that require them to use the vouchers in the former

public housing development or a replacement building, or they can offer tenant-based vouchers (Popkin 2020).

Low-Income Housing Tax Credit

The program subsidizes the acquisition, construction, and rehabilitation of affordable rental housing by awarding credits to private developers, enabling them to secure viable funding from private investors. Although not all public housing developments are eligible to receive the credit, it is a resource that many housing agencies use to address public housing capital needs and gap-fill conversion deals. "Four percent" credits, which are available to projects that secure an allocation of tax-exempt private activity bond financing, offer enough to cover moderate rehabilitation, while "9 percent" credits, which are more competitive, cover major rehabilitation or replacement.¹⁴

Choice Neighborhoods Initiative

The Choice Neighborhoods initiative provides grants to revitalize severely distressed public housing (and in some cases privately owned subsidized housing) and the surrounding neighborhoods. The initiative, which was first funded in 2010, requires one-for-one replacement of public housing units, guarantees displaced residents the right to return once development is completed, and requires case management and supportive services.¹⁵ The initiative focuses on improving conditions in the original property and surrounding neighborhood—for example, by requiring grantees to have a comprehensive plan to address challenges such as high crime and poorly performing schools and allowing funds to be used for neighborhood improvements (Popkin 2020).

Notes

- ¹ "Picture of Subsidized Households," US Department of Housing and Urban Development, accessed March 30, 2020, https://www.huduser.gov/portal/datasets/picture/about.html.
- ² "Picture of Subsidized Households," US Department of Housing and Urban Development.
- ³ See "How Much Do You Need to Earn to Afford a Modest Apartment in Your State?" National Low Income Housing Coalition, accessed January 31, 2020, https://reports.nlihc.org/oor; and Alicia Mazzara, "Rents Have Risen More Than Incomes in Nearly Every State Since 2001," Center on Budget and Policy Priorities, December 10, 2019, https://www.cbpp.org/blog/rents-have-risen-more-than-incomes-in-nearly-every-state-since-2001.
- ⁴ "DCHA Transformation Plan," District of Columbia Housing Authority, accessed January 31, 2019, https://dcha.us/.
- ⁵ Molly Parker, "Ben Carson Declared Mission Accomplished in East St. Louis—Where Public Housing Is Still a Disaster," ProPublica, August 8, 2018, https://www.propublica.org/article/east-saint-louis-public-housing-bencarson-declared-mission-accomplished; and Molly Parker, "HUD Took Over a Town's Housing Authority 22 Years Ago. Now the Authority's Broke and Residents Are Being Pushed Out," ProPublica, December 14, 2018, https://www.propublica.org/article/residents-are-being-pushed-out-of-wellston-missouri-housing-authority.
- ⁶ Since the 1990s, around 200,000 units have been transferred out of the public housing program. Some loss of units can be attributed to RAD, which allows agencies to convert public housing units to long-term subsidies under the Section 8 program. As of November 2019, the number of RAD-converted units was above 120,000 (Hayes and Gerken 2020).

- ⁷ Molly Parker, "HUD Long Neglected These Residents. Now as They Move Out, Some Feel HUD Let Them Down Again," ProPublica, April 6, 2018, https://www.propublica.org/article/cairo-thebes-hud-long-neglected-theseresidents-now-as-they-move-out-some-feel-let-down-again.
- ⁸ "Picture of Subsidized Households," US Department of Housing and Urban Development.
- ⁹ RAD launched in 2013 and intended to maintain public housing stock by resolving long-term capital needs shortfalls. For more information, see Hayes and Gerken 2020.
- ¹⁰ Mica O'Brien and Susan J. Popkin, "Our Aging Public Housing Puts Older Americans at Risk," *Urban Wire* (blog), January 30, 2020, https://www.urban.org/urban-wire/our-aging-public-housing-puts-older-americans-risk.
- ¹¹ "Operating Fund," US Department of Housing and Urban Development, accessed March 26, 2020, https://www.hud.gov/program_offices/public_indian_housing/programs/ph/am.
- ¹² "Public Housing Capital Fund," US Department of Housing and Urban Development, accessed March 26, 2020, https://www.hud.gov/hudprograms/phcapfund.
- ¹³ "Demolition/Disposition," US Department of Housing and Urban Development, accessed March 26, 2020, https://www.hud.gov/program_offices/public_indian_housing/centers/sac/demo_dispo/.
- ¹⁴ "Low-Income Housing Tax Credits," US Department of Housing and Urban Development, revised May 24, 2019, https://www.huduser.gov/portal/datasets/lihtc.html.
- ¹⁵ "Choice Neighborhoods," US Department of Housing and Urban Development, accessed March 26,2020, https://www.hud.gov/cn.

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Acknowledgments

This brief was funded by the Kresge Foundation and the Center on Budget and Policy Priorities. We are grateful to them and to all our funders, who make it possible for Urban to advance its mission.

The views expressed are those of the authors and should not be attributed to the Urban Institute, its trustees, or its funders. Funders do not determine research findings or the insights and recommendations of Urban experts. Further information on the Urban Institute's funding principles is available at urban.org/fundingprinciples.



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