Seeing More, Learning More: Equity in Housing and Community Development

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The opinions expressed in this article are those of the authors and do not necessarily reflect the views and policies of HUD or the U.S. government.

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Introduction

What does a renewed and reimagined commitment to equity require of the federal government's Learning Agenda on housing and community development? In addition, what does that commitment make possible in the way of opportunities to employ new methods and approaches to learning, with new reach and impact on social progress, including progress on racism and racial injustice? In this essay, we call for changes in three things to help understand and promote equity through the programs of the U.S. Department of Housing and Urban Development (HUD): (1) the types and sources of knowledge the agency seeks to generate and use; (2) the methods required; and (3) the scope of the Learning Agenda, to be far more intentional and creative about (actually) producing learning, as distinct from simply producing better and more available evidence in the form of evaluations. We address both the how and the what of learning, showing how those three changes could be applied in four core areas: (1) access to housing and opportunity; (2) identity-based discrimination and exclusion; (3) the built environment and environmental risk; and (4) the practice of active learning, regardless of program domain.

On that final point, we emphasize why and how HUD might shift from a *quality-evaluation* frame to a more outcome-oriented, participatory, and dynamic *policy learning* frame (knowledge in use, in dialectic), building on past efforts to engage with stakeholders and communities more inclusively.

This shift in focus would promote both the generation and wider use and testing of ideas through communities of practice, user-centered policy and program design, social audits, citizen science, and other mechanisms. This crosscutting opportunity—to see quality evaluation, and HUD's related work in policy analysis and performance measurement, as key *inputs* for learning, but also focus more intensively on the mechanisms that learning requires—has major implications for how we understand and advance equity. This approach acknowledges that evidence is often necessary, but almost never sufficient, for policy learning, not when it comes to some of the most divisive issues the nation has faced and will face.

Three meanings of learning are crucial here, if we are to apply an equity lens: (1) surfacing new knowledge about what is at stake and for whom (agenda-setting learning), including legacies of historical exclusion and other inequities; (2) expanding the sense of what is possible in the way of planned change or intervention (option-centered learning); and (3) improving understanding of the full effects of policy (feedback-loop learning), especially where those effects are disparate or differential by race, place, gender, or other identifiers. We illustrate these approaches to learning in a range of program domains and reference key housing market practices as well, such as the devaluation of Black-owned properties in home appraisal.

Before examining the premises and substance of HUD's proposed Learning Agenda, we briefly consider the historical context that underscores just how important a transformative, equity-centered learning agenda is, especially for an agency with HUD's mission.

Confident Expertise? Federal Agency Learning in Historical Context

The bipartisan Foundations of Evidence-Based Policy Act and President Biden's Executive Order on Advancing Racial Equity and Support for Underserved Communities offer some answers to the questions posed previously, particularly about what it means, operationally, for federal agencies to adopt systematic learning agendas and update them, together with agency programs and other operating practices, over time. To understand these recent mandates, it helps to reflect on the longer arc of history that informed them.

The lessons of this history, including the context in which HUD and its early ideas about evidence were forged, matter for the goals we set and the wisdom we bring, or fail to bring, to pursue those goals. In the context of the most extreme economic inequality the nation has seen in a century, the growing awareness of the stakes of the climate crisis and the many unknowns about how best to face it, and the call for a historic racial reckoning in America led by the movement for Black lives, now is not a moment to be without memory. On the contrary, we need more than ever to understand how our past shapes the assumptions and institutions we are working to improve now.

HUD was born at an extraordinary inflection in the nation's history, and the agency's commitment to systematic evaluation and learning, along with its mixed performance on that aspiration, reflects that genesis. HUD was created by an act of Congress in 1965, consolidating forerunner agencies with narrower missions and adding important new policy goals that reflected the era. The major ambitions

and gains of the Civil Rights Movement and President Johnson's Great Society agenda, which generated many new programs in addition to new agencies—combined with the growing confidence of the so-called policy sciences—produced an uncommonly robust policy development and research capacity at HUD, at least when compared with other domestic agencies (Pritchett, 2008; Briggs, 2015). The large-scale civil unrest in the Watts neighborhood in Los Angeles, also in 1965, and more than 100 other U.S. cities by the summer of 1967, only added to the sense of urgency and political possibility (although that window of attention and opportunity was short-lived).[1]

HUD was formed, in other words, where the determination to vigorously expand federal functions and investment through a "Second New Deal" met the conviction that the behavioral sciences, engineering, and other disciplines could be applied systematically to improve ambitious federal programs and the quality of policymaking and public debate about them. A *knowledge-producing* organization is not necessarily a *learning* organization, of course, let alone one supported by a society committed to learning. The fact that HUD was founded with a significant research mandate did not mean that its leaders, Congressional overseers, or other stakeholders were consistently interested in, let alone enthusiastic about, the agency's research findings or their implications, or even that the agency's program leadership heeded those findings. The larger point is that the dual circumstance of policy ambition meeting research ambition occurred in the 1960s at what was, in hindsight, the high-water mark of high modernism, as anthropologist James Scott (1998) has labeled it.

High modernism, Scott argues, is a viewpoint and set of institutional arrangements that combines a muscular and ambitious state with far-reaching claims to expert knowledge. At its worst, in a variety of political contexts and historical periods worldwide, that expert-dominated approach to governing has counted on a compliant civil society, either willing or obliged to accept the conclusions of the authorities who steer the ship of state. That state may be efficient and sometimes even socially just by the outcomes it produces, but it cannot be called democratic or accountable in its approach to governance.

That the 1960s modernist moment was also a high-water mark of social movement activism, with its call for a deep and inclusive democracy and economy, may be counterintuitive. Yet similar contradictions appear throughout our history and quite often in the creation of new functions or agencies of government. HUD's story is not an outlier: Social and political contradictions, it turns out, are generative. In a real sense, HUD was born of protest as well as program. Its learning aims and performance are marked by both.

We do not recount this history to argue that HUD was founded to keep society quiet and let the credentialed experts tinker. The agency's policies and programs, and sometimes its evaluation investments, have been the subject of intense media scrutiny and important public debates—the Moving to Opportunity[2] (MTO) social experiment is a prime example—and many of its aims have been furthered by the community reinvestment movement, fair housing movement, environmental

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[1] Public and scholarly attention to the "urban crisis" of that moment was short lived, as this Google Ngram illustrates: https://books.google.com/ngrams/graph?content=urban+crisis&year_start=1960&year_end=2019&corpus=26&smoothing=3&direct_url=t1%3B%2Curban%20crisis%3B%2Cc0.

[2] https://www.chicagotribune.com/news/ct-xpm-1994-07-23-9407230027-story.html.

justice movement, and other mobilizations for reform that allied grassroots activists with scholars, public-interest lawyers, policy professionals, elected allies, and others. We are merely underscoring how vital it is that, with the lessons and limits of HUD's first half-century as a guide, and in the context of new agenda-setting to advance equity, we *should* ask fundamental questions about what counts as expert knowledge, which policy and research questions should be asked at all and why, how and by whom to produce meaningful and legitimate answers to those questions by improving and innovating in our methods, and how to embrace and support learning—which is a social and sometimes political process, not just a cognitive one—beyond merely supporting more evaluation.

Even the most thoughtful and intensive evaluation, as early observers warned back in the modernist heyday, can be a narrowly technical endeavor, oblivious to social and political context (Lindblom, 1963; Lindblom and Cohen, 1979). Learning cannot afford to be so limited, however. Crucially, the U.S. Office of Management and Budget's (OMB's) implementation guidance on evidence-based policymaking calls on agencies not only to produce better evidence but to clarify "the methods and analytical approaches to facilitate the *use* of evidence in policymaking" (emphasis added, Circular A-11[3]).

These distinctions are not new, we realize, nor is the call to appreciate the limits of formal evaluation. But it is crucial that we place these concerns in the foreground as we examine HUD's Learning Agenda and the use of that Agenda to expand our understanding of equity and make tangible progress toward it in every part of the country, for every group.

In calling attention to implicit and other forms of bias in research and evaluation, to the importance of lived experience as a source of insight and judgment on research teams, and to the range and importance of specific methods for directly engaging "studied populations," HUD's new evaluation policy statement makes a commendable leap forward. The agency has gone on the record with a recognition that research is not a value-free exercise; researchers are human and prone to bias, not to mention imperfect framers of questions and creatures of their experiences in a deeply unequal world; and what is considered rigorous, let alone relevant and useful, must be judged in that context. The agency is now accountable for making, and explaining, its judgments about those issues and for applying an equity lens, in today's parlance, to the full range of its evidence-building standards: rigor, relevance, transparency, independence, ethics, and technical innovation. That is our starting point for this study.

President Biden's Executive Order begins by asserting that "equal opportunity is the bedrock of American democracy." We begin our assessment of HUD's proposed Learning Agenda, likewise, with what is arguably the most fundamental mission of the agency, from which many of the other goals in HUD's Learning Agenda derive: to promote access to decent, safe, affordable housing, and opportunity-rich communities for all.

Learning about Equitable Access, Agency, and Opportunity

Affordable and safe housing is increasingly out of reach for most households in the United States, but particularly for those with the lowest incomes. Access to affordable housing is one of the

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[3] https://www.whitehouse.gov/wp-content/uploads/2018/06/a11.pdf.

primary problems that HUD aims to address through its programs, but a legacy of actions and inactions by HUD and other government actors have segregated housing and perpetuated unequal access (Abrams, 1955; Briggs, 2005; Rothstein, 2017; Reina et al., 2021). The agency has, since its inception, funded research to understand how its policies and programs work and how they might work better (National Research Council, 2008). In many ways, this work has embodied a reliable ethos: how can we efficiently use and leverage limited resources, and to that end, what are the cost-effective adjustments and additions we can make to existing programs? Although it may not stir the body politic, this reflective adjustment approach—not unlike Charles Lindblom's seminal description of policy analysis as the making of "successive limited comparisons"—is essential for good policymaking and implementation (Lindblom, 1959). A more expansive view of the goal of policy learning, which includes revisioning what solutions can and should be, is likewise essential for progress. This is particularly true as HUD aims to directly address racial and economic inequality, because any effort to do so requires significant structural change.

A more expansive view of housing access, agency, and opportunity requires learning about things we still do not know, addressing unjust or wrong-headed ideas from the past, and creating new knowledge and solutions. This strategy can include, but is by no means limited to, such questions as:

1. *What are new models to increase housing access, supply, and affordability?* Much of HUD's learning has been around the limited toolkit it has at its disposal. There is a need to understand more clearly what this toolkit can be. The opportunity to do so has been clear during the COVID-19 pandemic, for example. The complex web of pandemic rent-relief programs rolled out across the country provided a unique opportunity to understand the potential impact of a more permanent emergency rental assistance funding stream, something that was barely considered prior to the pandemic (Aiken et al., 2022). There is also a clear chance to learn whether or how models like those in Philadelphia, which paired regulations (in this case, mandatory use of the diversion program) with resources (funding to address back rent identified through the diversion program), worked. The need for new models is something HUD has acknowledged (HUD, 2019). The mechanism for learning what those models can be, testing them, evaluating what is learned, and then disseminating such knowledge is less clear, however.

2. *What is a resident/household-centered definition of access, agency, and opportunity, and how can this understanding evolve over time?* We know surprisingly little—directly, at least—about what opportunity means to the people HUD programs aim to serve. Housing mobility research often highlights the many ways that policy, and even the learning around it, has imposed, on low-income and other disadvantaged households, normative, value-laden views about what access and opportunity mean. Some researchers have explored what a tenant-focused approach to defining opportunity looks like (e.g., Lung-Amam et al., 2018), but such efforts have never been centered in HUD's Learning Agenda. Ethnographic fieldwork and qualitative interviews to examine the experiences of participants in the randomized Moving to Opportunity program, in those participants' own words and reasoning, are examples of this type of learning (Goering and Feins, 2003; Briggs et al., 2010; Edin et al., 2016), although more work is needed to meaningfully scale such work and incorporate findings into program design and future evaluation. In sum, an equity-centered learning agenda needs to go beyond

views of access and opportunity as defined by researchers to views much more informed by those with lived experience.

3. *What are the barriers households face when attempting to access support, and how can we take a more intersectional approach to understand these barriers and the differential impact?* HUD has done some work to understand barriers to accessing programs, most notably devoting resources to analyzing ways to engage landlords in the rental voucher program in a more productive manner (Cunningham et al., 2018; Garboden et al., 2018). Nevertheless, we still rely on evidence from the early 2000s or studies on adjacent programs to understand how many households are able to even lease a unit when offered a voucher (Finkel and Buron, 2001; Reina and Winter, 2019). Considering that we know so little about HUD-assisted households, it is unsurprising that we know even less about the barriers faced by those households who either did not make it through a HUD application process or did not even apply (Reina and Aiken, 2021). More systematic analysis of need, who applies, and who makes it through the process of accessing housing assistance is critical. Moreover, a clear focus on the intersectionality and compounding nature of the barriers is essential to any equity-focused learning agenda.

4. *What strategies are effective for engaging and empowering communities, and how can they be better incorporated into HUD policies and programs?* HUD should invest in research to learn about the most effective strategies for engaging communities in meaningful ways. Meaningful engagement happened in some places during the Affirmatively Furthering Fair Housing (AFFH) planning processes because there was a mandate to do that engagement (Steil and Kelly, 2019). Some jurisdictions had to rely on local, private funders to support this more robust AFFH planning process; this program is something for which HUD should provide funding given its importance to learning about equity. As PolicyLink, Race Forward, The Urban Institute, Harvard University's Ash Institute on Democratic Governance and Innovation, New America, and other organizations have argued, HUD and other agencies, at all levels of government, should also go beyond narrow and limiting conceptions of engagement as consultative "participation" to experiment with approaches that directly build community voice and agency in shaping learning as well as programs—a critical shift to which we return, and illustrate specific practices in the final part of this essay (see Turner et al., 2021). Here, too, history is instructive, if we are willing to learn: The structuring, by decisionmakers, of opportunities for mostly low-grade, "ritual participation," especially by historically marginalized groups with a disproportionate stake in equitable and effective public policy, has been called out as a problem since the Great Society era—i.e., since the birth of public participation requirements (Arnstein, 1969). Over time, so have the failures of the rigid public-hearing model of input, which is rarely a mechanism for improving programs or other problem solving (Innes and Booher, 2004). HUD's interest in learning about more effective approaches to engagement, and the effects of those approaches, would directly support equity in the Learning Agenda and send a powerful signal to the field of housing and community development. The final part of our essay offers specific, actionable suggestions.

5. *Who are property owners?* HUD can play a critical role in helping the field better understand property owners. We know surprisingly little, systematically, about them, and efforts to mandate reporting requirements for owners are often met with skepticism and discussions of administrative burden. We cannot understand equitable access to America's housing and neighborhoods if we do not even know what kinds of landlords own the properties that we want people to access. Beyond that, additional research on how owners perceive programs and administrative burdens is essential if solutions are going to be designed around their participation. MTO researchers—in an effort to shed light on the shortcomings of the program and its implicit theory of change—called out the urgency of this attention to landlords, and of the "chain of cooperation" that ambitious voucher programs require, more than a decade ago (Briggs and Turner, 2008; Briggs et al., 2010).

There are several ways HUD can achieve these goals. First, HUD can spur learning and innovation that promotes access to stable housing at the local level with smaller pools of funds, specifically aimed at supporting programs that are not just incremental changes to what the agency already does (the Obama-era Social Innovation Fund is another model). Often, such local programs lack the resources for meaningful evaluation. That is why an innovation-driven federal funding source is essential. Fortunately, HUD recently reinitiated its research partnership funding and made the process of applying for that funding more transparent. From a learning perspective, that is another step in the right direction.

HUD could more actively partner with other federal agencies to understand the impact of accessing housing. Housing is increasingly viewed as a social determinant of many nonhousing outcomes, or co-benefits, of local, state, and national interest (Arcaya and Briggs, 2011; Taylor, 2018). For example, as of this writing, the National Institutes of Health has a funding call for research on the ways that COVID-related housing policies have affected health outcomes. The National Science Foundation (NSF) recently funded a series of projects where researchers partnered with government agencies to address the spatial mismatch between jobs and housing locations, with each project required to have a well-specified community engagement component. The NSF call addresses the need to catalyze the development of new models that draw connections between federal and local programs around housing, transportation, economic development, and schooling. This example is particularly instructive because the concept of spatial mismatch is a half-century old, and yet federal support for innovative responses, along with meaningful testing, has been limited to a few HUD demonstrations operated a generation ago and, in most cases, has had limited take-up by policymakers.

Such collaborative efforts should center structural racism in housing markets and policy as a focus of learning and action. HUD's ambitious MTO for Fair Housing, Bridges to Work, and Jobs-Plus demonstrations were launched in the 1990s, in a period of expanded policy and research ambition. As former HUD officials who organized those efforts have observed, however, all three were more focused on geographically concentrated poverty and economic isolation than the ongoing role of racism or the racialized experience of housing assistance, workforce development, transportation, and other systems.

Beyond greater support for rigorous qualitative and mixed-method research, HUD can expand the data it offers. For example, it can include documentation of both the nature and extent of community engagement in its publicly available data, alongside more detailed data on learning across the aforementioned topics.

Learning About Discrimination, Exclusion, and Affirmatively Furthering Fair Housing

The movement for Black lives has brought increased attention to the role that continuing racial discrimination and exclusion in housing and neighborhoods play in hoarding public resources and perpetuating racial injustice. The intersection of the movement for Black lives with the renewed energy in recent years in movements for stronger tenants' rights and affordable housing have dramatically expanded public conversations about how to advance housing justice.

As we have argued, shared learning, not just program evaluation, is essential to uncovering changing dynamics of discrimination and exclusion. Learning from the lived experiences of low-income households—in particular, their experiences at the intersection of access, agency, and opportunity—is an essential foundation for this learning. Participatory action research methodologies, working with tenant associations and community-based organizations for example, would be a powerful and effective, albeit time-intensive and resource-intensive, approach. One model for this kind of work is the Healthy Neighborhoods Study in Boston (Arcaya et al., 2018; Binet et al., 2019). Within this focus on the lived experiences of low-income households, it is essential to examine the intersections of the dimensions of identity that have been protected under the Fair Housing Act because they have so often been axes of discrimination. Looking at the intersections of race or ethnicity, disability, and family status, among other intersections, as HUD has proposed in its Learning Agenda, through participatory action research that combines both systematic qualitative research and innovative quantitative methods, is essential to illuminating how discrimination and exclusion continue to occur.

In addition to learning from the bottom up, it is important to study power and exclusionary processes from the top down. Critical theory has identified important insights about the role of private sector power in shaping housing markets in order to generate concentrated profits and of using public policy to preserve these inequality-generating structures (Marcuse, 1978; Harvey, 1989; Harris, 1993; Vale, 2013; Taylor, 2019). HUD should focus some of its learning on the expression of structural racism and other systemic inequities in housing markets, and the role of public policy in structuring those markets, in ways that concentrate inequitable wealth gains or facilitate resource hoarding. For example, the movements for Black lives, tenants' rights, and affordable housing have together focused public attention, particularly on the role of zoning in limiting access, agency, and opportunity, by driving up the costs of housing and excluding households on the basis of income and race. The Supreme Court, in its 2015 *Inclusive Communities* decision, specifically discussed cases at what it called the "heartland" of disparate impact liability under the Fair Housing Act, challenging laws, policies, and practices that "unfairly exclude" protected classes from wealthy neighborhoods or municipalities (*Texas Department of Housing and Community Affairs v. Inclusive Communities Project, Inc, 2015*). Popular movements have led to the

transformation of zoning laws in cities such as Minneapolis and states like Oregon to allow the development that could both reduce housing costs and open access. Advocates have also raised concerns that more targeted rezoning has disproportionately increased development in low-income communities and communities of color, producing or threatening displacement of incumbent households and bypassing or even reducing development in wealthier and whiter communities. HUD can play a crucial role in this fair housing learning by gathering and analyzing data on these land-use policies and their implications for fair housing and housing affordability. The same is true for the practice of home appraisal, where the systemic, longstanding devaluation of Black-owned property is receiving much-needed attention from policy researchers, HUD, and the appraisal industry (Perry, 2022; 2020).

The AFFH requirement in the Fair Housing Act and the AFFH Rule are important levers in HUD's efforts to realize its strategic goal of supporting underserved communities. Learning from the HUD grant recipients, community-based organizations, and residents who participated in the creation of Assessments of Fair Housing about what dimensions of the rule catalyzed conversations about racial equity and changed local housing and community development policies are important, and so is understanding what additional data and questions could be useful in the HUD-supplied AFFH Tool going forward.

Returning to land use patterns and policies, nationwide data on zoning would be particularly helpful for HUD to gather and analyze. This plan is doable—as The Urban Institute's Land Use Lab at Urban[4] (LULU) shows—and long overdue. For instance, through the AFFH tool or the Consolidated Plan process, the agency could gather relatively simple data on the share of land within a municipality (or even a state) that is zoned for multifamily development as of right compared with the share of land zoned for single-family development as of right, or similarly the share of land where living communities for people with disabilities are a use permitted by right. HUD could also gather data on the share of land consistent with each of these uses in areas of concentrated poverty (or, in a more demanding but flexible version of this data call, obtain geocoded zoning data and overlay these demographic or other variables, such as climate risk). Such data on local land-use regulations would help us understand the local political and legal processes that continue to drive up housing costs and divide communities on the basis of race and income.

To build on a point in the prior section of this essay, the ability of voucher holders to obtain housing ("lease up") and realize, over time, the expanded choice the program was designed and reauthorized to create, is increasingly fundamental to HUD's goals, given the shift in Congressional appropriations from public housing to vouchers used in the private rental market. HUD has proposed researching the experiences of voucher holders in jurisdictions with local prohibitions on source of income discrimination. This research is important, and it should be paired with research on landlord policies for broadly screening tenants and how the use of minimum income policies and credit scores, along with other criteria, may disproportionately or completely exclude voucher holders from rental units, and in so doing have disparate impacts on protected classes. This research also presents an opportunity to continue to evaluate Small Area Fair Market Rents as more public housing authorities (PHAs) adopt them.

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[4] https://www.urban.org/research-area/land-use#about

Along with warnings about limits of policy evaluation, early observers of the Great Society heritage, of which HUD is a part, underscored just how much policy gets made in implementation, that is, in the discretion allowed to public managers. This policy is especially true where devolution is the rule, as it is with most HUD programs: They are not administered directly by the agency but by the state, local, tribal, and territorial governments that receive HUD funding. Identifying exclusionary dynamics in the highly varied management of HUD programs is another important learning goal consistent with HUD's effort to support underserved communities. As a starting point, it would be important to learn systematically, from Fair Housing Initiatives Program agencies and others conducting fair housing investigations, what processes of exclusion, if any, they are identifying in HUD grantees and programs. Building on qualitative learning from the Fair Housing Initiatives Program agencies, HUD could analyze data that it already collects from PHAs to identify where there may be concerns about wealthy, White communities excluding disproportionately non-White households through local residency preferences or inappropriate waiting list policies for public housing units or Housing Choice Vouchers (*Fair Housing Justice Center., Inc. v. Town of Eastchester, 2020*).

The rise of new technologies in housing searches for prospective home purchasers and renters, and in landlord screening of prospective tenants, creates opportunities and risks. On the one hand, these technologies can reduce the costs of housing searches and increase the agency of movers by opening up access to a wider range of neighborhoods. Learning about how PHAs and private providers of search algorithms can help low-income households identify opportunity bargains and make informed choices about the broad options available to them is important. On the other hand, increased consumer reliance on these technologies creates new risks of discriminatory advertising (see, for example, *National Fair Housing Alliance v. Facebook, Inc. 2018*) and discriminatory provision of services (for example, *National Fair Housing Alliance v. Redfin Corp.*); such discriminatory practices are arguably more pervasive and less visible than before (*National Fair Housing Alliance v. Facebook Inc.*). To address these risks of discrimination and make the most of these opportunities to improve housing searches, HUD should learn with and from fair housing organizations and other federal agencies focused on the role of new technologies in housing searches, brokerage, and financing, as well as landlord screening—to enhance HUD's stated focus on appraisals and automated valuations. Building on HUD's four decades of work in evaluating discrimination through systematic audit testing, HUD could conduct more targeted testing studies going forward, focusing on "pockets" of discrimination, protected classes that have historically been neglected in research, and methods of discrimination that are harder to observe.

Finally, as we explore in the next section, environmental risk and disasters create opportunities to address racial inequality. Recent federal policy appears to widen disparities by race and housing tenure (with the policy favoring owners more than renters), and these disparities could help reproduce the racial wealth gap and other inequities over generations (Howell and Elliott, 2019). Learning from fair housing advocates and others participating in the disaster recovery process how best to bring a fair housing lens to bear on the diverging long-term outcomes of the Community Development Block Grant Disaster Recovery (CDBG-DR) program for homeowners, as compared with renters, as well as by race or ethnicity and disability, could help ensure that federal investments are narrowing those disparities, as these investments support households in recovery, instead of expanding them.

Learning About Equity in the Built Environment, Environmental Risk, and Climate Action

One area of HUD's Learning Agenda that is less frequently engaged through formal research and evaluation, but is often well-funded when it does, is the physical quality of housing and communities in both human-made and environmental conditions. Considerations of equity, however, have rarely factored into these learning opportunities.

Examples of HUD reports and data-collection efforts that address these issues periodically include the American Housing Survey and Worst Case Housing Needs reports to Congress. There are also case or project-specific efforts, such as evaluations of the aforementioned CDBG-DR program, technological change, housing innovation (including the barriers to adoption and scaling of the same), capital needs assessments, and energy consumption in HUD-assisted homes. Across HUD, however, there are a larger number of data-collection and maintenance efforts that could also be considered part of the Learning Agenda and that address physical conditions and technological and environmental change, such as the data collected and managed by the housing, public housing, and community-planning and development divisions. Finally, HUD's Learning Agenda with regard to physical conditions is also informed by data collection and analysis in other parts of the federal government, such as the Federal Emergency Management Agency's (FEMA) Individual Assistance data after disasters and the Department of Energy's Residential Energy Consumption Survey.

The main point is not that these issues are ignored, or are for now stovepiped rather than integrated (although they are), but that these efforts and datasets address equity in perfunctory ways, if at all. Equity can, in more than one way, be operationalized into dimensions that can inform research and policy that is specific to physical interventions and qualities (Martín and Lewis, 2019). For example:

1. *Understand historical legacies of inequality and their ongoing effects.* The local histories and experiences of legacy physical effects—such as substandard housing or disproportionate energy cost burdens—could be used to prioritize those same projects, places, and people for additional research and learning. There simply needs to be more attention to equity in the research project scopes.

2. *Monitor the current demographic makeup of a physical intervention's users, beneficiaries, or other affected stakeholders.* The identification of demographic and behavioral groups in a research or learning project has long been an essential step toward measuring the differential effects of an intervention. In HUD's social programs, such as low-income rental housing assistance, this method has been the standard procedure for decades. Several opportunities for conducting this basic descriptive analysis are overlooked when it comes to physical and environmental conditions, however, such as receipt of FEMA and HUD disaster aid and analysis of racial and other forms of inequity in that receipt. Ensuring that basic demographic data are collected and analyzed would be a major step forward.

3. *Engage stakeholders from end to end.* Involve all stakeholders in all phases of a research project's development, design, staffing, and management. This step, which is one expression of

procedural equity or fairness, has been partially addressed in HUD's evaluation equity statement. It acknowledges the importance of who frames questions and interprets findings, not just who collects data or performs analysis, and it highlights the fact that engagement can extend from basic input by stakeholder groups to the co-creation of research agendas and methods to pursue them. Consistent with the emphasis on learning from lived experience and on the value of participatory research methods, highlighted in the prior sections of our essay, there are myriad ways to work with communities to collect data on housing quality in construction and the environment, such as working with "citizen scientists." This study should not only be addressed in the form of the research scope and in the hiring of research contractors but also in HUD's internal staffing of its research and learning work.

4. *Use accessible, inclusive language.* Ensure that access to a research or learning project is not made exclusionary, such as through jargon or overly technical language. This principle is especially important for the physical and environmental dimensions of HUD's Learning Agenda, given the default to the specialized vocabulary of the building industry and environmental science. Additional resources should be used to ensure that the methods and media for communicating to individuals and communities regarding technical housing concepts should be scrutinized to ensure that access is inclusive.

5. *Track variation in learning participation and learning product use by group and geography.* These factors can be key indicators of underlying inequities in access to research knowledge and debates about what should be researched, by whom, and how. Typically, scholars are primary targets for HUD's research dissemination, but this policy should extend further to communities, while ensuring that the scholars in question are consistently diverse and that the teams are also inclusive.

With regard to specific projects, there is also a range of learning opportunities at the intersection of equity and the physical qualities of homes and communities:

1. Refine definitions of housing adequacy (and the aggregate statistics currently used). For example, include energy-efficiency and consumption performance standards, exposure to community-wide environmental hazards, and property climate exposures.

2. Overlay housing adequacy on demographic characteristics and spatial patterns of settlement and mobility, especially to enable analyses of differential exposure, risks, and consequences.

3. Assess access to federal assistance programs for improved energy performance, hazard mitigation, and disaster recovery by race and other identifiers.

Supporting Learning Itself, Not Just Program Evaluation and Policy Analysis

Over nearly six decades, and particularly during changes in which political party ran the executive branch, HUD's political leadership has shown very uneven attention to equity priorities, not to mention uneven rigor in analyzing equity and applying lessons to HUD's programs. The agency has

vacillated in another fundamental way as well—on the importance of any form of research in support of the agency's mission and the evolution of the wider field, on what quality research requires in the way of adequate commitment and resources, and on how—and under what conditions—research might come to have a meaningful impact on policy and program learning. The targets, scale, and impact of HUD's policy development and research work, in other words, have varied widely over time. A large body of empirical literature, provocatively synthesized in Elaine Kamarck's book, *How Change Happens—or Doesn't: the Politics of U.S. Public Policy* (2013), documents the challenges to improving practice in the public sector in sustained ways and the even greater obstacles to scaling important innovations. Suffice it to say that HUD has not been immune to those forces, including pointed efforts to ignore the agency's less politically popular findings or to let ideology, rather than facts, drive decisionmaking. These forces have shaped both program delivery and research functions at HUD.

For many reasons, it matters that HUD and other agencies not only commit to systematic research, and do so with a creative and evolving equity lens, but that this nation's government *modernizes the way it understands learning.* It is not enough to exalt data-driven decisionmaking, although to be sure, we should never take for granted that facts will matter to policymakers, implementers, or the public. Perhaps more than ever before in the agency's history, unabashed racial bias in our politics and disinformation in our media are very real threats. Our broader concern is that, for all the commendable attention to what equity demands of research and researchers, there is remarkably little said in HUD's Learning Agenda about learning itself—what it is or how it happens. For the most part, this official document is about producing evidence and making it available. To be more specific, it is about seeing that *better* evidence can be made *more* available to enable learning *if* the conditions are right. The last, critical part is largely implicit.

HUD and its staff cannot ensure those right conditions, but they can do more, and be supported to do better, than hew to the wishful rational policy and planning model in which learning follows from producing evidence. In this final argument about advancing equity, we reflect on what learning is and how it actually happens.

A basic model of learning, one that understands it to be a social and sometimes political process and not just a cognitive one, focuses on who can or should learn what, why, and how. In other words, it begins by putting learning in context. Exploring this concept in depth across the range of policy goals and specific puzzles in HUD's Learning Agenda would require a book-length volume, not this brief essay, but some of the fundamentals are:

- Reconsider *who learns,* underscoring that the learners are embedded in specific institutional contexts—such as Congress, with its lawmaking and oversight responsibilities, or the mortgage finance industry, with its business models and investors, to name but two—as well as a wide range of knowledge and practice networks and places. Rarely have uniform learning products or mechanisms served all these actors in all these settings well. HUD should seek to produce learning, not just evidence as an input to learning, in creative ways that reflect this range of learners, the kinds of actions they can or should take (where learning meets purposeful action), and where and how they learn best in context. There are multiple ways to do this tailoring, and there are many potential partners for doing it well and within resource

constraints. Below, we offer simple examples of this concept in practice. For now, the essential points are that a focus on learning spotlights (1) the range of active learners and (2) contexts in which they are embedded, which in turn help clarify (3) the process by which they actually learn, not just receive a report or briefing, or attend a webinar discussion. We delve into point (3) after the next point.

•   Reconsider *the what and why* of learning. This reconsideration does not ignore large inventories of specific program questions (the core of HUD's Learning Agenda document), but it adds needed perspective to what learning might happen around those questions and how. Since that modernist historical moment in which HUD was founded, observers have shown persuasively that even policy analysis can be understood, variously, as multi-stakeholder puzzle-solving or engaged and critical listening, or, in a more disembodied and traditional conception, as mere advice-giving by those with appropriate training (Moran et al., 2008). It follows that learning is a many-splendored thing when it comes to what policy intends, what it becomes, and how it affects people and the planet. In the introduction, we emphasized three meanings of learning as crucial to applying an equity lens: (1) surfacing new knowledge about what is at stake and for whom (agenda-setting learning); (2) expanding the sense of what is possible in the way of planned change or intervention (option-centered learning); and (3) improving understanding of the full effects of policy (feedback-loop learning), especially where those effects are disparate or differential by race, place, gender or other identifiers. Even the third meaning is, in practice, contestable. We do not mean purely subjective as to what defines the facts or "state of the world," but rather the meaning is subject to debate about whether some discovered pattern, in fact, represents a problem—moral or environmental or otherwise—that should be remedied somehow (Gaventa, 1980; Kingdon, 1984; Briggs, 2008; Freeman, 2008).

It is telling and instructive that private funders of housing and community development innovation, especially in philanthropy, made notable shifts in this direction of learning during the past two decades while continuing to fund careful evaluation work. Initially, most of the nation's private, social-impact funders trailed and mimicked the federal government, creating evaluation offices and officers to gauge program effectiveness, trusting that active knowledge use and learning would follow. They were generally disappointed by the limited application of evidence within their organizations, not to mention the wider field of policy and practice, in part because the traditional, evaluation-centered theory of knowledge impact has dealt so poorly with the complexity, contention, and uncertainty that shape real-world decisionmaking and its effects. Now those funders are arguably ahead of government, emphasizing what organizational, collective, or field-level learning requires and deploying formal evaluations together with other approaches to further that learning (cf. Patrizi et al., 2013).

Evaluators, who have been central to the evolution of policy analysis as a field since mid-century, have long recognized that evaluation can serve a wide variety of learning objectives, from gauging whether a program is achieving its goals to scrutinizing the goals themselves, illuminating the conditions that make innovation possible or thwart it, and other vital purposes. Our emphasis here is on the fundamental importance of centering the learning goals and the means by which critical

learning can happen, rather than leading with what evaluations are possible—or what their specific limits are. Centering learning would challenge familiar practices of agencies such as HUD and thus of what could be true centers *of* learning within government (for now, they mostly commission in-house analyses as well as external studies). That centering would reveal a dynamic range of active learning mechanisms available to HUD and to other federal, state, local, and tribal governments and their partners in the field, all of which go beyond the traditional study-production capacity. To illustrate a few of those mechanisms:

Communities of practice (CoPs) are arguably the best-developed mechanisms for organizing continuous learning and innovation around well-defined fields of practice—such as equitable delivery of housing assistance or supporting equitable disaster recovery—and sometimes for inventing new fields (Wenger et al., 2002; Snyder and Briggs, 2003). Formally organized CoPs came first to the private sector, thanks to surging interest in business innovation and managing knowledge in the 1990s, and were systematically documented and compared after that. Soon, however, the first public sector and multi-sector public interest CoPs, such as for workforce development or disaster preparedness, were launched and analyzed as well, generating evidence on effectiveness over time (Pyrko, Dorfler, and Eden, 2016).

Fully considering what CoPs add to policy and program learning and under what conditions requires some decentering, namely to focus on fields and the outcomes they seek more than specific government programs. CoPs can also operate as learning vehicles around specific programs, as the Economic Development Administration is showing now in its innovative Build Back Better Regional Challenge grant program. The defining feature of an effective CoP is a focus on the productive *use*, not just the generating, of new knowledge. This focus, in turn, requires sustained effort to generate knowledge that is, in fact, *actionable* and not just *relevant*, to use the classic distinction suggested by Chris Argyris (1996). The potential for all federal agencies is significant, even if agencies initially help organize or join looser "learning communities" rather than more formally structured CoPs.

In a related vein, a growing body of ideas about what defines *strong fields*—elements such as a vibrant knowledge base and active policy support—is applicable to federal work to advance equity in collaborative and durable ways. This strong-field work calls for sharing knowledge more dynamically and in much more targeted ways than traditional, centralized models of study and dissemination, which follow the bureaucratic and often inflexible norms of official reporting, have ever allowed (Bridgespan Group, 2009). The through-line here is seeking social impact at scale and understanding that to be a fundamentally collaborative project, one that requires the sustained efforts of fields of actors that do not, over time, devolve into new orthodoxies resisting healthy change (i.e., the vanguard becoming the defensive old guard). In this view, it is the fields, not just government programs within them, that must be made and kept strong—through collective investment and scrutiny over time.

Continuing on the topic of scrutiny, social audits are believed to have originated in Europe in the 1970s. By the 1990s, they were being deployed in poor communities in India, and soon after in South Africa and other nations in the global South, to illuminate and change chronic underperformance and inequities in the delivery of government programs (Pekkonen and

Sadashiva, n.d.). Audits organize civil society groups, sometimes independently and sometimes jointly with the government, to monitor, track, analyze, and evaluate government performance and accountability (Hausmann-Muela, 2011).

Next, user-centered design has been applied effectively to the design and redesign of benefits delivery and other government functions in recent years, including notable achievements in the area of homelessness prevention and reduction (McGuinness and Schank, 2021). Employing user-centered design would be a boon to HUD's efforts to advance equity through more dynamic approaches to knowledge. The approach shares with social audits the premise that users are not just clients with needs but holders of unique knowledge, creativity, and agency. These approaches not only valorize but activate the value of lived experience and empower the co-creation of better approaches that get measurable results.

Finally, as we highlighted in the prior section, citizen science emphasizes the participation of everyday people, not just conventionally trained scientists, in generating scientific knowledge and monitoring conditions critical for scientific understanding. Like the other mechanisms we have highlighted here, citizen science promises more active, broader-based engagement in discovery and the greater legitimacy that such engagement can help confer on new knowledge. While citizen science is best known as an organizer of monitoring, for example of air and water quality, for environmental health and justice (Corburn, 2005), this approach could be applied to a wide variety of puzzles or problems, from housing quality to climate risk or indicators of housing discrimination, for which *distributed* knowledge in *diverse* forms, *blended* effectively, enriches both the questions asked and the answers generated. Citizenscience.gov now operates to promote the use of these methods across the range of government goals and functions.

As that final approach underscores so explicitly, it is not the supplanting of the scientific method but democratizing it and blending its outputs with other forms of knowledge and influence that are so powerful and so long overdue. The essence of that leads us to the road ahead.

The Right Kind of Progress

HUD was born at a unique moment in the history of the nation and, as such, with a very particular set of convictions about what defines good policy and how to improve it through learning. As Jim Collins and Jerry Porras argued in their best-selling *Built to Last: Successful Habit of Visionary Companies* (1994), it falls to every organization, and each generation that operates it with the hope of making it great, to determine how best to "preserve the core and stimulate progress." HUD's evidence-centered standards—rigor, relevance, transparency, independence, ethics, and technical innovation—are core. Not only are those standards well worth preserving at the heart of HUD's Learning Agenda, but they matter more than ever because of persistent inequity, because of what we are learning, however imperfectly, about what advancing equity requires in America, and because of intensified threats from disinformation and well-funded campaigns to deepen distrust of public institutions generally. Surprising as it may seem, however, therein lies the path to progress as well. If the past is prologue, success in practicing the new ways of seeing and learning we have advocated will not only advance equity but help redefine learning itself, generating important new concepts, methods, and questions—and the hope of greater legitimacy, public trust, and support.

Acknowledgments

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