

Addressing Barriers to Housing in Reentry Programs Working to Address a Variety of Needs: A Qualitative Study of Second Chance Act Grantees

Elizabeth L. Beck
Natasha N. Johnson
Sommer Delgado
Victoria Helmly
Susan A. McLaren
Alice Prendergast
Leigh Alderman
Lorenzo Almada
Brian Bride
Eric Napierala
William J. Sabol
Georgia State University

Abstract

Using data from an evaluation of three Second Chance Act grantees, we explore formerly incarcerated people's (FIP) access to housing. This study is unique in that it includes the perspectives of individuals with lived experiences and the insights of the reentry program providers working to meet their overall needs, including in the area of housing. The data come from reentry programs in three regions of the United States. Although the needs of the people with lived experiences have similarities, regional differences exist, particularly related to housing costs and supply, including the availability of transitional housing. Also, variations exist between FIP who are able to live with family compared with those who do not have this option. The three programs this study examined worked to address housing needs in distinctive ways and explores the housing needs of FIP and the strategies the three programs use to address these needs. Incorporating a two-pronged approach, this article includes analyses of (1) interview data with 31 FIP from 3 months to 3 years post-incarceration and (2) interviews and program materials to support formulative case analyses of the housing-related work that program enacted. Through this work, highlighting program efforts to remove barriers to housing for this population, the study seeks to promote the advancement of relevant policy, practice, and research in this arena.

Key Words: Barriers to Housing, Second Chance Act, Post-Incarceration, Post-Release, Formerly Incarcerated People, Recidivism, Reentry, Transitional Housing

Introduction

In 2020, one in five U.S. households experienced housing insecurity, and the nightly shelter count of homeless people in 2021 was 326,000. For formerly incarcerated people (FIP), stable housing represents the foundation for successful reentry from prisons and jails (HUD, 2022). It is against this backdrop that the 600,000 people released annually from prisons and the 6 to 7 million people who are booked and released from jail in a year must find housing (Kovera, 2019; Rodríguez-Pose and Storper, 2020; Spaulding et al., 2011, 2009; Yousefi-Rizi et al., 2021).

Housing, a primary determinant in one's ability to successfully reintegrate, is a challenging barrier that FIP face (Bowman and Ely, 2020; Geller and Curtis, 2011; Gunnison and Helfgott, 2011; Remster, 2019). For a person reentering from incarceration, safe and affordable housing is more than mere shelter. Stable housing is associated with positive psychosocial outcomes, including employment, physical and behavioral health, and lower rates of recidivism (Bostic et al., 2012; Semenza and Link, 2019). A criminal record exacerbates FIP's challenges in finding housing, as Marcia Fudge, Secretary of the U.S. Department of Housing and Urban Development (HUD), succinctly stated—

Individuals with criminal histories too often face daunting and unnecessary barriers to obtaining and maintaining housing, including public housing, HUD-assisted housing, and HUD-insured housing, which are often the only types of housing they can afford [...] Too often, criminal histories are used to screen out or evict individuals who pose no actual threat to the health and safety of their neighbors. And this [policy] makes our communities less safe, because providing returning citizens with housing helps them reintegrate and makes them less likely to reoffend. (Fudge, 2022, p. 1)

The search for shelter among FIP is fraught with resource barriers and exclusionary policies (Remster, 2021). This general lack of access to housing can be considered a public safety issue. As such, after the initial Second Chance Act (SCA) of 2008 expired, Congress reauthorized it within the First Step Act of 2018 under Title V—Second Chance Act of 2008 Reauthorization.^{1,2} Both bipartisan bills provided assistance for programs for FIP to successfully return and reintegrate into their communities. Through the SCA, the Bureau of Justice Assistance and the Office of Juvenile Justice and Delinquency Prevention have made more than 800 awards across 49 states since 2009 (Ritter, 2014). Even in areas where grant recipients are working to support FIP, securing housing remains difficult (Bae et al., 2016; Simmons University School of Social Work, 2016).

Although people with lived experiences of reentry often have difficulties securing housing, regional differences exist, especially related to housing costs and supply. This article examines data from three geographically different SCA grantees, explores FIP's access to housing, and includes both the perspectives of individuals with lived experiences and the insights of the reentry program providers

¹ *Second Chance Act of 2008*. Public Law 110-199.

² *First Step Act of 2018*. Public Law 115-391.

working to meet their needs. While none of the reentry sites had a specific focus on housing, according to the SCA legislation, grantees are to provide comprehensive services that include support with social services, jobs, and housing. This article begins by reviewing the relevant literature on the reentry-housing-community development nexus.

Literature Review on the Reentry-Housing-Community Development Nexus

Access to safe, stable, and affordable housing remains a prevalent—and foundational—need among FIP as they reenter society. Geller and Curtis (2011), Remster (2021, 2019), and Smoyer et al. (2021) found that FIP frequently experience prolonged, unstable housing situations and “ping-pong” between friends, family, romantic partners, shelters, and other temporary living arrangements (Smoyer et al., 2021). Those who do not have familial access to housing are often led to housing programs such as halfway houses or shelters, and others will face unsheltered homelessness (Baxter et al., 2019). Remster (2021, 2019) evidenced the prolonged nature of ping-pong housing, reporting that 49.6 percent of FIP who used shelters did so in the 2 years following release. This finding points to the lack of stability often associated with living with friends or family post-release, as overcrowding, family tensions, and other issues surface. These issues are, in many instances, exacerbated by the income constraints of those providing housing to FIP and the income constraints of FIP (Fontaine, 2013).

Extensive literature discusses the relationships between poverty and crime and poverty and recidivism (Goodley, Pearson, and Morris, 2022; Jacobs et al., 2022; Nivette, 2011; Olver, Stockdale, and Wormith, 2014; Patel et al., 2018; Pratt and Cullen, 2005). Hayat (2022: 657) investigated these relationships and noted that “poverty may be a more significant predictor of recidivism than dangerousness.” In their study involving 3,000 low-income men, Geller and Curtis (2011) found that FIP were twice as likely to fall into one of the most extreme forms of poverty and homelessness than others with similar risk factors. This finding is concerning, given the strong relationship between homelessness and reincarceration (Brown, 2004; Moschion and Johnson, 2019; Travis, Solomon, and Waul, 2001). In a study of roughly 50,000 men released from New York State prisons, Metraux and Culhane (2004) found that 11.4 percent experienced homelessness; of that population, nearly one-third were reincarcerated (Metraux and Culhane, 2004; Metraux, Hunt, and Yetvin, 2020). In addition, Travis, Solomon, and Waul (2001) observed that FIP living in homeless shelters were seven times more likely to not meet parole expectations due to the compounding effects of homelessness that put them at greater risk for rearrest. Compounding factors include rearrests for so-called ‘quality-of-life offenses,’ often incurred as people attempt to meet their daily needs while living unsheltered (Travis, Solomon, and Waul, 2001).

Recognizing that housing provides a foundation from which one can seek employment, maintain sobriety, address behavioral, mental, and physical health needs, and make positive contributions to their community, the United States began implementing the Rapid Rehousing model for people experiencing homelessness in 2014 (Beck and Twiss, 2018; Padgett, Henwood, and Tsemberis, 2015). Rapid Rehousing swiftly provides housing based on the assumption that once persons experiencing homelessness obtain housing, they have the space and support to mitigate other issues. The model has proven successful across various matrices, including cost-effectiveness, and can be considered a response to previous models that did not prioritize housing (Lee, Shinn, and

Culhane, 2021; Padgett, Henwood, and Tsemberis, 2015). Rapid Rehousing holds essential lessons and implications for the future of reentry work in terms of its philosophy and the strategies used to overcome barriers to housing (Fontaine, 2013).

A criminal record is a significant barrier to securing housing. This record allows property owners to deny FIP rental applications, disproportionately affecting minoritized citizens' efforts to obtain housing (HUD, 2022). This exclusion extends to public housing agencies (PHAs), which administer federally subsidized housing at the local level. Historically, PHAs had prohibitions on renting to people with felony records, and in some locations, this prohibition includes misdemeanors. Other policies limit the ability of friends and family participating in PHA programs to support FIP through housing. In response, President Barack Obama issued guidance to PHAs in 2015 to remove these constraints. However, the decision to follow this guidance was left in the hands of PHAs; ultimately, few changes were made (Hayat, 2022; Voborníková, 2016). On June 23, 2021, Secretary Marcia Fudge made a second appeal to remove barriers to public housing. As part of the American Rescue Plan, 7,000 housing vouchers were awarded to 600 PHAs for use by FIP at risk for homelessness (Fudge, 2021).

In a randomized controlled trial, the Maryland Opportunities Through Voucher Experiment, 0 percent of the formerly incarcerated participants who received housing vouchers in the first wave were rearrested. In subsequent waves, a few members of the treatment group were rearrested. In this same vein, "rearrest was lower among the treatment group of movers than the nonmovers and was also lower for nonmovers who received free housing versus nonmovers who did not receive housing" (Kirk et al., 2018: 213). In contrast, 22 percent of individuals in the control group were rearrested (Kirk et al., 2018). The New York City Department of Homeless Services and the New York City Housing Authority created the Family Reentry Pilot Program, which resulted in the rearrest of only 1 of the 150 participants who received a public housing unit and participated in a program to support family reunification (Bae et al., 2016). As impressive as these studies are, they did little to address subpopulations with unique housing struggles. The Maryland program was not open to women, and only 8.5 percent of the participants in the New York program were women, who frequently face additional barriers like seeking housing suitable for their children. The programs also did not explicitly address access to housing for people convicted of sexual crimes. The barriers to housing for both populations are substantial.

When considering the reentry-housing-community development nexus, it is necessary to acknowledge the combination of the following policies. First, the austerity measures used to dismantle public housing; second, the rise of mass incarceration; and third, the policing and criminal justice policies that disproportionality affect the incarceration rates of people of color (Alexander, 2010; Beck and Twiss, 2018). Black and Latinx people are incarcerated at five times and one and one-third times the rate of White people, respectively. During the past 50-plus years, these policies collided to create a reentry-recidivism cycle that fuels the prison industrial complex (Beck and Twiss, 2018; Kovera, 2019; Williams, Wilson, and Bergeson, 2019). Instead of making communities safer, the inability to securely house FIP often leads to reincarceration and the perpetuation of policies disproportionately targeting people of color (Western and Sirois, 2019).

Data and Methods

Data were collected from each SCA-funded site between the summer of 2021 and early 2023. The data collection process included one multiday site visit and regular interaction between the authors and the SCA-funded sites. In addition, program providers from each location participated in a 1-hour interview via video conferencing software (for example, Zoom) that was recorded and transcribed. During these interviews, program providers were asked a series of questions designed to better understand the role and goals of each site in the reentry-housing-community development nexus. Information was also collected through documentation the site personnel provided, and the authors obtained information via site visits and ongoing conversations. Open coding was used to identify categories from these data.

Data Collection and Analysis

In the summer of 2022, the evaluation team interviewed 31 FIP who participated in SCA programs. The SCA site assisted with recruiting subjects by using recruitment materials the evaluation team provided and that the institutional review board approved. As a part of this recruitment, the evaluation team requested that the sites try to refer individuals with diverse experiences regarding the length of time since exiting prison; specifically, the team sought an array of individuals with diverse backgrounds, program perceptions, and transitional experiences. Participants were asked about ongoing interactions with the SCA program providers and their reentry experiences, including barriers to reentry, but were not explicitly asked about their housing situations. Interviews were between 30 and 180 minutes each and were primarily conducted within the SCA site. However, several participants elected to participate through video conferencing software or telephone. All participants were compensated \$50.00 per hour for the interviews. The data from these interviews were recorded, transcribed, and then coded using an open coding method to identify categories. Some authors worked together to code the data, and interrater reliability was achieved with several of the remaining authors.

Participant Overview

Demographic data on the participants were collected during the interviews. A diverse set of participants were interviewed, categorized by their self-classified gender, race and ethnicity, and age group. Interviewers asked open-ended questions regarding these demographics. Exhibit 1 outlines participants' self-identities.

Exhibit 1

Participant Demographic Data*	
Participants	n = 31
Gender	
Men	22
Women	9
Nonbinary and Gender Nonconforming	0
Race and Ethnicity	
Black	12
White and Caucasian	7
Hispanic*	7
Other or Multiracial	5
Age	
18–25	4
26–35	12
36–45	9
46 or Older	6

* Based on participants' self-identities.
 Source: authors' data

Program Overview

The three sites in this study are each uniquely situated in their community and generally use different strategies and resources to support program participants. Each site implemented its respective program to reduce recidivism. The first site, implemented at a local probation department, is designed to reduce recidivism among FIP returning to their communities from prison by initiating case planning, service referrals, and reentry preparation prerelease. In regard to housing and other social service needs, the program used referrals and pursued memorandum of agreements with more than 50 organizations to provide services to FIP. The referral process begins during incarceration when program providers make referrals based on participants' reentry needs, including housing, employment, and other services.

The second site is a community-based organization with a pre and post-release reentry program designed to reduce recidivism by identifying specific needs that are not currently available through community support. The program is a partnership between the community-based organization and a local law enforcement office. The program acts as a liaison between the network of post-release service providers and FIP, providing case management services, education and training, housing coordination, and mentoring services.

The third site is a local governmental organization with a long history of collaborative efforts to support successful reentry using a coalition of service providers. The program is designed to reduce recidivism and address systemic gaps in reentry services, focusing on the specific needs of incarcerated parents. This program includes individualized needs assessments, intensive

programming during incarceration, and referrals to community agencies that provide reentry services post-incarceration.

Findings

The following sections detail the findings—first, those related to FIP and housing and, second, the barriers programs worked to address to meet the housing needs of participants.

Affordability—Living Wages and Cost of Living

Participants mentioned several challenges related to the financial barriers to finding stable, safe housing. Although the housing markets in the three cities varied significantly, housing affordability was noted in all three cities. Some participants spoke of a shortage of housing, specifically, the lack of safe, affordable housing options that would meet their needs. Conversations with participants about housing affordability and other financial barriers often also included information about available employment opportunities. One participant stated—

I mean, I've had a couple interviews, but honestly, my background isn't the greatest, so that I'm not going to get a good job [...] It's just going to be something that's minimum wage. And when you think about it, minimum wage is nothing compared to how much the cost of living is now.

Another participant, who lives with his mom as his caregiver, mentioned that their combined incomes are so low that they rent out one of the rooms in their house to afford housing costs. He further explained that they would be “going through hard times” without this additional money.

Whether their criminal record affected their employment search or the jobs available did not pay enough to afford safe and stable housing in their communities, the link between employment and housing in their reentry experiences was evident. These experiences varied by site; however, in all locations, participants discussed how the local job market or the wages at their current job influenced their ability to secure housing. Participants who lived with family but wanted to find their own housing also often described their employability or wages as a barrier to securing a place to live. In addition, participants with children sought housing that was safe and suitable for their children, including the need for additional room, which affected the affordability of their housing search.

Several participants mentioned the cost of housing and other financial requirements to apply for housing in the private market, like deposit amounts, poor or no credit, and income requirements. One participant mentioned that an apartment complex required him to prove that his income was three times the monthly rent amount, which was impossible for him to do. Another participant talked about the challenges of income requirements as a single parent. She said, “So that's just my main thing is that background and just having to make triple by yourself. I could see if it was you and somebody else, with your guys' income combined, but by yourself, that's a ladder to climb.” Other participants mentioned that credit checks were required in some of the housing they sought, which was a barrier for them. One person explained, “Right now, I'm trying to find a house. I can make the money for it. I got the money. The money is not the issue. It's the credit thing. I've never

had a bill in my life. I've never paid; I probably paid a phone bill when I was like 18. That was it." For participants who did have credit scores, the minimum credit score requirement to apply for housing was too high.

The effect of discrepancies between clients' wages and local housing costs was evident at each site. One of these sites is in an area known for its very high cost of living, and the other sites reported the cost of rental properties and housing skyrocketing with the COVID-19 pandemic. Because of the cost of housing, one of the sites stated they are working on securing opportunities for higher-wage jobs so that participants can afford a place to live. Two of the sites also discussed the importance of credit history, and both worked with clients to obtain documents and credit scores. One site encouraged participants to find building management positions, as they often include housing as compensation.

Arrest Records, Administrative Barriers, and Other Nonfinancial Barriers to Stable Housing

Participants described several administrative or nonfinancial barriers to housing, including criminal history and paperwork requirements, like birth certificates, social security, or other identification cards. These barriers relate to accessing housing programs designed to assist them with housing needs and to apply for housing in the private market. As with Section 8 in general, there is often a dearth of available housing and resistance to participating in the Section 8 program. Limited access to housing is an additional strain for FIP who have Section 8 vouchers and criminal records. Also, nonfinancial barriers exist to using housing vouchers or staying with family or friends who use housing vouchers. Programs described how the inspection requirements of vouchers made landlords less likely to accept them. One program explained how they work to convince landlords who hesitate to accept Section 8 vouchers because of past experiences with other Section 8 residents. They assure landlords that the participants in their program have a lot of support and that the program staff are involved in their lives, including doing home visits. A participant described how Section 8 rules prevented him from staying with friends or family that received benefits, saying, "if somebody has Section 8 or something, and I need a place, I can't stay with them ... because I'm a felon."

For some participants, their criminal histories or the conditions of their parole or probation create limitations on where they can live and their ability to access housing. For one participant, living with a family member proved to create challenges with the conditions of his release. The family member worked in security and had a firearm in the home, which was a violation for the participant. Another participant was participating in drug court, with a requirement being that he stay in a halfway house. He felt the drug court would not allow him to get his own apartment, saying, "Like getting my own house, my housing, they won't let you until they think you're ready. They don't appreciate the good that somebody's doing like they should do." Another participant said that although criminal records used to be a significant barrier to housing, affordability was the biggest obstacle, and it mattered more whether one could make three times the rent than if one had a criminal history when applying for housing.

Other participants talked about how criminal record background checks affected their ability to secure employment that would allow them to live independently. One stated—

I was actually interested in getting some of that expunged, because when people look up my background, it's like they meet me, and then when they look up my background, they're like, 'I can see that you're a good person, but' ... I've done got fired from jobs because of my background.

Aside from the barriers due to a person's criminal history, other administrative challenges inhibit securing stable housing. In this study, the paperwork involved in applying for financial assistance for housing was prohibitive. Participants described exiting incarceration without any identification, and programs required birth certifications, social security cards, or driver's licenses to apply for housing assistance. Some programs offering housing assistance scheduled meetings to help participants with paperwork. However, one participant missed these appointments on multiple occasions due to rigid scheduling timeframes and her inflexible parole officer.

All programs assisted participants with documentation, such as identification needed to apply for housing programs. One program worked specifically on the expungement of criminal records. This program indicated that the time to secure the documentation and complete everything required for HUD housing is too short. To address documentation issues, for 1 week during the month, the program convenes a large event that brings FIP and programs together. As part of this monthly event, participants are provided onsite assistance with issues like driver's license reinstatement, child support modifications, and other documents needed to secure jobs and housing.

Family and Social Support

Living with a family member or a partner was common among the participants in this research across all three sites. This arrangement included living with parents, siblings, extended family, friends, and current or ex-partners. In one program, the staff estimated that more than one-half of participants live with family or partners. For some of the study participants, living with families was their only option for housing. One participant stated, "I'm basically homeless, and if it wasn't for my mom, I'd be living in my car." Some participants were living with family or a partner, providing care for loved ones with serious illnesses, including one participant who is a full-time, paid caregiver for a partner with a terminal condition. Other participants noted that they were able to help their families with housing costs by staying with them.

Although this living situation was favorable for some, the team learned that many participants viewed this arrangement as temporary and not ideal due to conflicts or personality differences. In some cases, the housing was unsafe due to both neighborhood and family members' engagement in illegal activities. Several participants just wanted a place of their own. For participants with children, some wanted to establish a home on their own with their children. It was common among our participants to stay with family members and their children. For example, one participant described living in a full house (with mother, siblings, and siblings' children) and not having a private room.

Several participants inherited or were given property from family members that provided them with a stable and safe place to live. However, two participants were unstably housed and unable to live in the family property because of the trauma they associated with the house. One participant discussed finding his brother, who had overdosed, on the property his parents gifted them. Another participant inherited her parent's house, the home she grew up in, but felt she could not live with the memories.

Site personnel also revealed that living with family is a widely used strategy but noted that it is often a "very temporary to temporary" solution. One of the sites indicated that they generally do not view living with family members as a real solution because the stay is typically short-term. Program providers at each site were asked about participant exploitation; only one indicated that they knew of one such experience, with each site saying that it likely happens. When asked, sites also recognized that due to location parameters, staying with friends and family is often prohibitive for people convicted of sexual crimes.

Need for Independence and a Place of Their Own

For most participants in various living situations (living with their families, in shelters, in halfway houses, or with roommates), finding a place to live independently was vital to them. Nearly every participant stated that finding a place to live independently was one of their short- or long-term goals. For participants in unstable housing situations, securing stable housing was a priority. For those with more stable housing in the short term, purchasing a home was one of their long-term goals. Participants looked forward to having their own space or, at minimum, a place to store their belongings. One participant noted that their main complaint about their current living situation with a parent and younger siblings is that they lack privacy. They mentioned that being in one's own space offers freedom and time to "...be in my feelings, be in my thoughts, pray, cry...."

Participants who wanted a place of their own spoke about how their current living situations lacked privacy, freedom, and safety. Some participants believed having their own place to live would give them a sense of accomplishment and stability. One participant reported drug use in the house and that his housemates were not supportive enough of his sobriety. Another participant was sexually assaulted in her home and relocated to a battered women's shelter. This participant described being robbed several times since her release. Moving several times since her release for safety reasons also made it difficult for her to stay connected to program providers and to keep track of and complete the paperwork she had been given. In addition to overcoming financial and other barriers, providing a safe home for their children was of the utmost importance to interviewees. One participant said, "I have found a landlord who has a nice house on the south end by Medical College. And if, indeed, I can get in that house, it is a decent neighborhood where I don't got to worry about my daughter getting gunned down by a stray bullet."

Each site's response to participants' needs for independence varied. Two facilities saw long-term independent housing as a goal, and another was concerned more about ensuring that participants had roofs over their heads. The sites that worked toward long-term housing also acknowledged that this type of housing had limitations. For one, it is generally found in low-income areas that are problematic due, in part, to violence and proximity to criminal behavior.

Interactions With the SCA-Funded Programs

Participants described several ways the programs in the SCA evaluation offered support in securing housing. In some instances, the case managers were hands-on in helping participants search for accommodations, including calling landlords on their behalf and taking the participants to see available housing. Other examples included helping participants create a personal budget to determine the housing options they can afford. In addition, some participants described how the program linking them with employment—and, in some cases, higher-wage jobs—could help them overcome some of the barriers to housing.

Some participants felt the housing programs could be more hands-on or proactive with housing assistance. Participants described being referred to programs or handed a list of shelters or apartments but doing most of the leg work. Other participants described being unaware of the program's housing assistance. One participant, for example, explained that he would not have known about the housing assistance available if he had not known to ask. He said—

I know [the program] got a lot of things for us, but they're not going to sit there and tell you. You got to ask questions; you got to speak up, say something. You will never know until you say something [...] For instance, with the housing thing, I never knew about that. I found that out from word of mouth, from somebody else.

Participants discussed how the program financially assists with housing, including paying for rent and application fees. However, the requirements or criteria for this assistance can be restrictive. For example, one program secured rental assistance for up to 6 months for clients if they were within 120 days post-release from jail. This requirement meant one participant was ineligible, because she stayed with family post-release. She wanted to use the voucher to secure a place to live independently but was unaware of the assistance until after learning she was ineligible.

Another participant talked about time limits in the housing program in which he was participating. He stated that the transitional housing he was in was only available for a certain period. If he met the program's requirements, that time could be extended; however, after the first extension, the participant would have to find another option. When the sites are not administering the services, they must rely on their referral partners. One participant was enrolled in a program to pay her rent but stated that her landlord never received the rent. This program receives referrals directly from the site, although she engaged with the program on her own. She described child protective services taking away her child after being evicted from her housing.

Second Chance Act-Grantees' Efforts in Securing Housing

The staff at each SCA grantee site recognized the importance of housing, and two programs cited it as the most crucial resource for the population. In one conversation, a staff person stated, "Workforce development, it's great. Substance abuse, great. All that stuff is needed. But none of it matters at all if you don't have a place to lay your head that's safe."

Program staff recognize the systemic challenges that make overcoming housing barriers so difficult. A staff person explained, "[it's] such a larger part of a systemic problem, and it all goes back to

poverty.” She described their clients’ layered disadvantages, largely tied to a lack of resources and the barriers of a criminal record. Despite these challenges, each site worked to secure housing using the following strategies: Partnerships, referrals, and case management; securing additional housing units; and using HUD resources.

Referral, Case Management, and Partnership

Every site engaged in partnerships, referrals, and case management and had either a housing coordinator or a case manager whose work focused on housing. One of the programs relied on partners to provide more intensive case management than the program structure supported, which included obtaining housing. Two of the three programs contracted other providers to set aside shelter and transitional “beds.” The third program is working to develop contracts with transitional housing units that are in development. This program was also able to secure 22 Section 8 vouchers annually.

In one of the sites, a community-based partner renovated a motel that now provides the SCA program with 265 units of transitional housing. Two of the programs partnered with community-based organizations that assisted clients with security deposits. One program provided the first and last month’s rent, and a second community-based organization provided up to 6 months of rent. In the latter situation, the SCA program negotiated services for 15 participants; however, the rental assistance was provided through The American Rescue Plan Act 2021 and will end within a year. One of the SCA programs used an innovative approach that had a family reunification component, which provided cash support to family members that were housing participants. The hope is that the money used to offset household expenses might increase program participants’ stability.

To varying degrees, each program indicated that, at times, they needed to use shelter space. In one of the sites, the SCA case manager continued to provide direct support in finding better housing alternatives, and one of the sites provided no additional support. The third site was in a community that used a tiered shelter system. The first tier offered little to no services, and the second tier provided case management, especially related to housing. When participants were in a tier-one shelter, the SCA program staff worked with them until they were moved to the next level.

Sites Working to Expand Housing

Efforts to expand housing opportunities included engaging landlords and brick-and-mortar development. Two of the SCA sites worked hard to develop partnerships with landlords. For example, one program jotted down every “for rent” sign and scoured social media to look for available housing. Two programs discussed the effort they needed to advocate for their clients with landlords who are hesitant to rent to FIP. One of the SCA programs informs landlords that the program will vet potential participants, as the program views this process critical to the sustainability of this approach. This program is also considering developing a certificate program for renters that would focus on what it means to be a reliable and successful tenant.

Another program attempted to develop new housing. The site sought to create a 14-bed supportive housing program through its SCA grant. The program then purchased an office building and planned to convert it into a mixed-use space to include housing. Because the property was commercially zoned, it needed to be rezoned, which required a public hearing. Despite gaining the

support of local commissioners, the site faced strong opposition from community members, and the rezoning effort was denied. Now, the site is raising money to develop supportive housing for FIP 55 and older, which it sees as a proactive way to address the compassionate relief their state is offering to senior incarcerated people. The program providers feel confident about their ability to secure zoning, as they are already operating housing on this specific lot and have built rapport with the community.

Using HUD Resources

Each site discussed the importance of rapid rehousing, and each indicated that this option is a long shot for their client population, given the scarcity of space in the program and the limited time in which new applications are accepted. However, one program has worked hard to break these barriers and set aside Section 8 vouchers from their local housing authority. Regardless, a shortage of Section 8 units and paperwork are some of the additional obstacles to using the vouchers. This program is working hard to develop relationships with landlords and ensure that participants have the credentials they need to apply for Section 8 housing, including supporting documentation such as birth certificates. Program staff noted that the short timeline to provide the documentation was an additional barrier to securing units and wished they could work with participants' prerelease on this process. Program staff also discussed the difficulties associated with finding housing for women with children and families.

This program is also supported by a long collaborative relationship with the localities' HUD program and a forward-thinking housing authority, supporting Section 8 use for FIP since the progression of relevant PHA guidelines from 1975 to the present (National Housing Law Project, 2008). For example, this housing authority offers a \$500.00 incentive to landlords willing to accept HUD vouchers. The program sees the incentive as one potential tool to counter landlords' hesitancy to accept vouchers due to the stringent nature of the annual housing inspection HUD requires. This highly collaborative SCA program also supports state policy under discussion to develop a certificate of qualification that will help protect landlords if they experience damages and losses resulting from their tenants.

In addition, all programs discussed the difficulties of finding housing for people convicted of sexual crimes and FIP with children, the costs of housing due to location, or rent hikes that occurred with the COVID-19 pandemic. Neighborhoods were also discussed as an issue, as accessible housing is often in problematic regions in terms of safety and proximity to illegal activities.

Major Findings

Although the sites in this study operate in different contexts and have different strategies to address the housing needs of participants, the themes uncovered were very strong within and across sites. In many instances, the participants and program staff were aligned in their views of the prominent challenges and barriers to housing. Ultimately, it is evident from these interviews that housing is a primary concern and has a significant effect on the lives of FIP and their families. Participants lived in a variety of housing situations, from shelters to transitional housing to family members' homes. The people interviewed also had various family ties and responsibilities that affected their housing

situations and needs. Aside from the financial challenges of securing housing, compounding administrative barriers were present, including credit score requirements. A significant thread that linked many of the participants was their desire and need to have housing they could call their own. They sought independence and privacy, regardless of their current housing situation. The existing barriers to housing stand in the way of achieving this goal.

Consistent with Bowman and Ely's (2020: 423) findings, the provision of stable housing is a critical need for FIP reentering society, and its absence can have a deleterious effect on physical, mental, and behavioral health and can hinder job searches. Stable housing directly affects both the reentering individual and the community at large, as housing often provides a critical space in which one can enact life changes needed to reduce recidivism and desistance. Even though addressing housing was not the primary objective for any of the three sites, each of the reentry sites recognized the importance and key role of FIPs finding stable housing as a predicate to successful reentry and each worked to support FIP across a variety of spectra, with one participant highlighting the importance of housing and income compared with other needs—

I'm an ex-addict. Well, actually, I'm a recovering addict, but [I use] every excuse possible to use. You know what I mean? Like me not having my kids right now or me just in a situation where I'm living or anything, or anything, not the house or no job or whatever. It's just a reason to continue to f*** up, to where like, in [...] But if we had a house, or let's say if I had a home or let's say I have this really nice job and then a decent place, or whatever, it's almost like that would trump that because you don't want to mess it up. You know what I mean? But it's so hard to pull, because of, I'm an ex-felon, to pull myself from the bottom.

This quote demonstrates the importance of housing in this FIP's life and the struggle to achieve specific post-incarceration goals. It also signifies that housing cannot be divorced from employment and income. For many individuals, housing provides a foundation for seeking employment, and as the data show, living with a family member or with others can also serve as a temporary bridge from which FIP can seek employment. However, given the cost of housing on the open market and the difficulties in earning a living wage, connecting FIP with employment opportunities that will allow them to secure stable housing is important. Without programmatic efforts that address housing and employment, the lasting effect of interventions is perhaps more questionable.

Presently, many people without criminal records are ill-housed and in need of services and living wage jobs. McChesney (1990) likened the search for housing among homeless people, for example, to a game of musical chairs in which those who were more able-bodied and carried fewer burdens were more likely to secure chairs, and those who had more difficulties were left standing. The presence of a criminal record can be a deciding factor in a person's efforts to secure housing, given the limited availability of extant resources. Therefore, it is important to recognize that FIP are often competing with less burdened people for already very limited resources. Among FIP, a hierarchy of burdens also exists, as women tend to have a more difficult time securing housing than men, largely due to the need to find space for children, coupled with histories of interpersonal violence and exploitation. Although none of the sites in our study provided explicit information about their efforts to work with people sentenced for sexual crimes, each site did mention the challenges involved in finding spaces for these individuals, including shelters.

The current housing problem echoes broader employment, income, poverty, and housing-access issues. In this regard, FIP are entering and navigating markets with the stigma and, in some cases, exclusionary policies associated with a criminal record. Therefore, it is incumbent on stakeholders to develop proactive ways to support the housing needs of FIP, assisting them with the logistics of reentry and also addressing issues of desistance and recidivism. The following section offers recommendations for improving the reentry-housing-community development nexus.

Recommendations for Improving the Reentry-Housing-Community Development Nexus

Both SCA participants with lived experiences and service providers alike emphasized the importance of housing, particularly considering housing as it is connected to broader employment, income, poverty, and housing-access issues. As such, what follows are recommendations provided by participants, as well as information synthesized by the authors that build on the literature, interviews, and additional data collected as part of the evaluation grant.

Recommendations at the Federal Level

1. Given the housing challenges FIP face, opportunities exist for HUD and the SCA grantors (the U.S. Department of Justice [DOJ] and Bureau of Justice Assistance) to enhance collaboration in support of SCA-funded programs. Collaborative efforts might include providing support for SCA programs to work with local public housing agencies to ensure that they follow Secretary Fudge's guidelines allowing FIP to participate in voucher programs. Additional efforts might include highlighting the positive effects of collaboration between local reentry programs and PHAs as one of the sites discussed. The collaboration model set by this reentry site shows the mutually beneficial nature of the partnership, as the site works to ensure that all vouchers are used, thereby allowing the PHA to maintain its allotment.
2. Opportunities exist for DOJ and HUD to explore testing innovative reentry grant efforts. Given the positive results of rapid rehousing for the general population of homeless people, a HUD-offered demonstration grant for people reentering can be an important contribution. It would be helpful if such a demonstration included a data and cost-benefit component to test if rapid rehousing provides the same benefits to FIP as it does to those who are homeless. Due to the costs associated with prison and jail, a cost-saving effect is likely with this approach. Other possibilities for innovation include incentivizing landlords to accept vouchers for FIP. As with one of the study sites, this might include processes for SCA initiatives to vet future Section 8 renters.
3. The connection between housing and income is two-fold and provides ample opportunity to use reentry grants for income support for housing. The team encourages DOJ to examine the imbued opportunities presented here and consider testing this model.

Recommendations That Can Be Implemented at All Levels

1. The supplemental funding through efforts such as the American Rescue Plan Act of 2021 provided invaluable support to some of the sites. The inclusion of rental assistance allowed FIP to secure or maintain housing. The programs developed with this funding need to be

continued through public or private dollars.

2. Innovative reentry efforts, such as providing incentives to family members with whom FIP stay as one of the sites discussed, should be shared, and efforts used to obtain public and private resources should be supported.

Recommendations for Programs

1. Programs working with FIP should prioritize stable and safe housing as FIP reenter post-incarceration. If possible, the programs should begin this work prior to the FIP's release to ensure their needs are assessed, they have access to emergency shelter post-release if necessary, and they can begin to establish the paperwork necessary to apply for critical housing assistance. In addition, programs should work to ensure that FIP are aware of the housing assistance available to them through the program or the program's referral agencies. Even if FIP do not ask for housing assistance or talk about their housing struggles, they may require housing assistance.
2. Given the strong connection between employment and housing, programs should work to assist participants in overcoming financial barriers, including their search for higher-wage employment and application requirements, such as deposit amounts. Program participants who remain unbanked or underbanked may not have a credit score. As a result, programs should look toward services that will assist participants in establishing and building credit, which will assist in removing an additional important barrier to housing.
3. To remove barriers to employment and housing, programs should work to establish access to expungement, where available.

Conclusion

The work to improve the lives and trajectories of FIP and the communities in which they reside continues as the team continues to build more fruitful relationships with housing providers, local PHAs, and other relevant stakeholders. Consistent with the prior literature on the reentry-housing-community development nexus, this study's findings reiterate the need to prioritize housing in the efforts to support FIP and reduce recidivism. By highlighting program efforts to forge these relationships and remove barriers to housing for this unique population, the team seeks to move this needle forward by promoting the advancement of relevant policy, practice, and research in this arena.

Acknowledgments

This project was supported by Award No. 2020-CZ-BX-0014, awarded by the National Institute of Justice (NIJ), Office of Justice Programs, U.S. Department of Justice. The opinions, findings, and conclusions or recommendations expressed in this publication are those of the authors and do not necessarily reflect those of the Department of Justice.

The authors would like to thank the Bureau of Justice Assistance, the NIJ, the three collaboration sites, the study participants, and all stakeholders who worked to see this product to fruition.

Authors

Elizabeth L. Beck is a professor in the Department of Social Work at the Andrew Young School of Policy Studies, Georgia State University. Natasha N. Johnson is a clinical instructor in the Department of Criminal Justice and Criminology at the Andrew Young School of Policy Studies, Georgia State University. Sommer Delgado is a doctoral candidate in the Department of Criminal Justice and Criminology at the Andrew Young School of Policy Studies, Georgia State University. Victoria Helmly is a doctoral candidate in the Department of Criminal Justice and Criminology at the Andrew Young School of Policy Studies, Georgia State University. Susan A. McLaren is an assistant project director in the Georgia Health Policy Center at the Andrew Young School of Policy Studies, Georgia State University. Alice Prendergast is a senior research associate in the Georgia Health Policy Center at the Andrew Young School of Policy Studies, Georgia State University. Leigh Alderman is an assistant project director in the Georgia Health Policy Center at the Andrew Young School of Policy Studies, Georgia State University. Lorenzo Almada is a clinical assistant professor in the Department of Economics at the Andrew Young School of Policy Studies, Georgia State University. Brian Bride is a distinguished university professor in the Department of Social Work at the Andrew Young School of Policy Studies, Georgia State University. Eric Napierala is a research associate II in the Georgia Health Policy Center at the Andrew Young School of Policy Studies, Georgia State University. William J. Sabol is a distinguished university professor in the Department of Criminal Justice and Criminology at the Andrew Young School of Policy Studies, Georgia State University.

Direct all correspondence to Natasha N. Johnson, Department of Criminal Justice and Criminology, Andrew Young School of Policy Studies, Georgia State University at njohnson93@gsu.edu.

References

- Alexander, Michelle. 2010. "The War on Drugs and the New Jim Crow," *Race, Poverty and the Environment* 17 (1): 75–77.
- Bae, John, Margaret diZerega, Jacob Kang-Brown, Ram Subramanian, and Ryan Shanahan. 2016. *Coming Home: An Evaluation of the New York City Housing Authority's Family Reentry Pilot Program*. New York: Vera Institute of Justice. https://www.vera.org/downloads/publications/NYCHA_report-032917.pdf.
- Baxter, Andrew J., Emily J. Tweed, Srinivasa Vittal Katikireddi, and Hilary Thomson. 2019. "Effects of Housing First Approaches on Health and Well-Being of Adults Who Are Homeless or at Risk of Homelessness: Systematic Review and Meta-Analysis of Randomised Controlled Trials," *Journal of Epidemiology and Community Health* 73 (5): 379–387. <https://doi.org/10.1136/jech-2018-210981>.

- Beck, Elizabeth, and Pamela C. Twiss. 2018. *The Homelessness Industry: A Critique of U.S. Social Policy*. Boulder: Lynne Rienner Publishers. <https://www.degruyter.com/document/doi/10.1515/9781626377974/html?lang=en>.
- Bostic, Raphael W., Rachel L. J. Thornton, Elizabeth C. Rudd, and Michelle J. Sternthal. 2012. "Health in All Policies: The Role of the U.S. Department of Housing and Urban Development and Present and Future Challenges," *Health Affairs* 31 (9): 2130–2137. <https://doi.org/10.1377/hlthaff.2011.1014>.
- Bowman, Edward I., and Katherine Ely. 2020. "Voices of Returning Citizens: A Qualitative Study of a Supportive Housing Program for Ex-Offenders in a Rural Community," *The Prison Journal* 100 (4): 423–46. <https://doi.org/10.1177/0032885520939273>.
- Brown, Katherine. 2004. "Homelessness and Prisoner Re-Entry," *Criminology and Public Policy* 3 (2): 201–222.
- Fontaine, Jocelyn. 2013. *Examining Housing as a Pathway to Successful Reentry: A Demonstration Design Process*. Washington, DC: Urban Institute. <https://www.urban.org/sites/default/files/publication/24206/412957-Examining-Housing-as-a-Pathway-to-Successful-Reentry-A-Demonstration-Design-Process.PDF>
- Fudge, Marcia L. 2022. "Eliminating Barriers That May Unnecessarily Prevent Individuals with Criminal Histories from Participating in HUD Programs." https://www.hud.gov/sites/dfiles/Main/documents/Memo_on_Criminal_Records.pdf.
- . 2021. "Letter from the United States Secretary of Housing and Urban Development." https://www.hud.gov/sites/dfiles/PA/documents/SOHUD_reentry_housing_letter.pdf.
- Geller, Amanda, and Marah A. Curtis. 2011. "A Sort of Homecoming: Incarceration and the Housing Security of Urban Men," *Social Science Research* 40 (4): 1196–1213. <https://doi.org/10.1016/j.ssresearch.2011.03.008>.
- Goodley, Gary, Dominic Pearson, and Paul Morris. 2022. "Predictors of Recidivism Following Release from Custody: A Meta-Analysis," *Psychology, Crime and Law* 28 (7): 703–729. <https://doi.org/10.1080/1068316X.2021.1962866>.
- Gunnison, Elaine, and Jacqueline B. Helfgott. 2011. "Factors That Hinder Offender Reentry Success: A View From Community Corrections Officers," *International Journal of Offender Therapy and Comparative Criminology* 55 (2): 287–304. <https://doi.org/10.1177/0306624X09360661>.
- Hayat, Norrinda Brown. 2022. "Housing the Decarcerated: Covid-19, Abolition, and the Right to Housing," *California Law Review* 110 (3). <https://californialawreview.org/print/housing-the-decarcerated-covid-19-abolition-the-right-to-housing/>.

Jacobs, Leah A., Laura Ellen Ashcraft, Craig J. R. Sewall, Danielle Wallace, and Barbara L. Folb. 2022. "Recidivism in Context: A Meta-Analysis of Neighborhood Concentrated Disadvantage and Repeat Offending," *Criminal Justice and Behavior* 49 (6): 783–806.

<https://doi.org/10.1177/00938548221076094>.

Kirk, David S., Geoffrey C. Barnes, Jordan M. Hyatt, and Brook W. Kearley. 2018. "The Impact of Residential Change and Housing Stability on Recidivism: Pilot Results from the Maryland Opportunities Through Vouchers Experiment (MOVE)," *Journal of Experimental Criminology* 14 (2): 213–226. <https://doi.org/10.1007/s11292-017-9317-z>.

Kovera, Margaret Bull. 2019. "Racial Disparities in the Criminal Justice System: Prevalence, Causes, and a Search for Solutions," *Journal of Social Issues* 75 (4): 1139–1164. <https://doi.org/10.1111/josi.12355>.

Lee, Barrett A., Marybeth Shinn, and Dennis P. Culhane. 2021. "Homelessness as a Moving Target," *The ANNALS of the American Academy of Political and Social Science* 693 (1): 8–26.

<https://doi.org/10.1177/0002716221997038>.

McChesney, Kay Young. 1990. "Family Homelessness: A Systemic Problem," *Journal of Social Issues* 46 (4): 191–205. <https://doi.org/10.1111/j.1540-4560.1990.tb01806.x>.

Metraux, Stephen, and Dennis P. Culhane. 2004. "Homeless Shelter Use and Reincarceration Following Prison Release," *Criminology and Public Policy* 3 (2): 139–160.

<https://doi.org/10.1111/j.1745-9133.2004.tb00031.x>.

Metraux, Stephen, Dana Hunt, and Will Yetvin. 2020. *Criminal Justice Reentry and Homelessness*. Rockville, MD: Center for Evidence-Based Solutions to Homelessness.

http://evidenceonhomelessness.com/wp-content/uploads/2020/04/Reentry-and-Homelessness_Synthesis-of-the-Evidence.pdf.

Moschion, Julie, and Guy Johnson. 2019. "Homelessness and Incarceration: A Reciprocal Relationship?" *Journal of Quantitative Criminology* 35 (4): 855–887. <https://doi.org/10.1007/s10940-019-09407-y>.

National Housing Law Project. 2008. "An Affordable Home on Re-Entry: Federally Assisted Housing and Previously Incarcerated Individuals." <https://www.nhlp.org/wp-content/uploads/2018/08/Rentry-Manual-2018-FINALne.pdf>.

Nivette, Amy E. 2011. "Cross-National Predictors of Crime: A Meta-Analysis," *Homicide Studies* 15 (2): 103–31. <https://doi.org/10.1177/1088767911406397>.

Olver, Mark E., Keira C. Stockdale, and J. Stephen Wormith. 2014. "Thirty Years of Research on the Level of Service Scales: A Meta-Analytic Examination of Predictive Accuracy and Sources of Variability," *Psychological Assessment* 26 (1): 156–176. <https://doi.org/10.1037/a0035080>.

Padgett, Deborah, Benjamin Henwood, and Sam Tsemberis. 2015. *Housing First: Ending Homelessness, Transforming Systems, and Changing Lives*. Oxford University Press.

<https://doi.org/10.1093/acprof:oso/9780199989805.001.0001>.

Patel, Vikram, Jonathan K. Burns, Monisha Dhingra, Leslie Tarver, Brandon A. Kohrt, and Crick Lund. 2018. "Income Inequality and Depression: A Systematic Review and Meta-Analysis of the Association and a Scoping Review of Mechanisms," *World Psychiatry: Official Journal of the World Psychiatric Association (WPA)* 17 (1): 76–89. <https://doi.org/10.1002/wps.20492>.

Pratt, Travis C., and Francis T. Cullen. 2005. "Assessing Macro-Level Predictors and Theories of Crime: A Meta-Analysis," *Crime and Justice* 32: 373–450.

Remster, Brianna. 2021. "Homelessness Among Formerly Incarcerated Men: Patterns and Predictors," *The ANNALS of the American Academy of Political and Social Science* 693 (1): 141–157. <https://doi.org/10.1177/0002716221993447>.

———. 2019. "A Life Course Analysis of Homeless Shelter Use among the Formerly Incarcerated," *Justice Quarterly* 36 (3): 437–465. <https://doi.org/10.1080/07418825.2017.1401653>.

Ritter, Nancy. 2014. "'Cultural Shift' Is Among Findings of Second Chance Act Evaluation," *National Institute of Justice Journal* 273 (March): 28–34.

Rodríguez-Pose, Andrés, and Michael Storper. 2020. "Housing, Urban Growth, and Inequalities: The Limits to Deregulation and Upzoning in Reducing Economic and Spatial Inequality," *Urban Studies* 57 (2): 223–248. <https://doi.org/10.1177/0042098019859458>.

Semenza, Daniel C., and Nathan W. Link. 2019. "How Does Reentry Get Under the Skin? Cumulative Reintegration Barriers and Health in a Sample of Recently Incarcerated Men," *Social Science and Medicine* (1982) 243 (December): 112618. <https://doi.org/10.1016/j.socscimed.2019.112618>.

Simmons University School of Social Work. 2016. "The Challenges of Prisoner Re-Entry Into Society," *Simmons University blog*, July 12. <https://online.simmons.edu/blog/prisoner-reentry/>.

Smoyer, Amy B., Danya E. Keene, Maribel Oyola, and Ashley C. Hampton. 2021. "Ping-Pong Housing: Women's Post-Incarceration Trajectories," *Affilia* 36 (3): 336–356. <https://doi.org/10.1177/0886109920954416>.

Spaulding, Anne C., Sebastian D. Perez, Ryan M. Seals, Madhura A. Hallman, Ravi Kavasery, and Paul S. Weiss. 2011. "Diversity of Release Patterns for Jail Detainees: Implications for Public Health Interventions," *American Journal of Public Health* 101 (Suppl 1): S347–52. <https://doi.org/10.2105/AJPH.2010.300004>.

Spaulding, Anne C., Ryan M. Seals, Matthew J. Page, Amanda K. Brzozowski, William Rhodes, and Theodore M. Hammett. 2009. "HIV/AIDS Among Inmates of and Releasees From U.S. Correctional Facilities, 2006: Declining Share of Epidemic but Persistent Public Health Opportunity," *PloS One* 4 (11): e7558. <https://doi.org/10.1371/journal.pone.0007558>.

Travis, Jeremy, Amy L. Solomon, and Michelle Waul. 2001. *From Prison to Home - The Dimensions and Consequences of Prisoner Reentry*. Washington, DC: Urban Institute. <https://www.urban.org/research/publication/prison-home-dimensions-and-consequences-prisoner-reentry>.

U.S. Department of Housing and Urban Development (HUD). 2022. "Meeting the Housing Needs of Formerly Incarcerated and Justice-Involved People." <https://www.hud.gov/reentry>.

Voborníková, Pavla. 2016. "The Transformation of American Public Housing," *Scientific Journal of Humanistic Studies* 8 (14): 75–83.

Western, Bruce, and Catherine Sirois. 2019. "Racialized Re-Entry: Labor Market Inequality After Incarceration," *Social Forces* 97 (4): 1517–1542. <https://doi.org/10.1093/sf/soy096>.

Williams, Jason M., Sean K. Wilson, and Carrie Bergeson. 2019. "It's Hard Out Here If You're a Black Felon': A Critical Examination of Black Male Reentry," *The Prison Journal* 99 (4): 437–458. <https://doi.org/10.1177/0032885519852088>.

Yousefi-Rizi, Leila, Jong-Deuk Baek, Nicole Blumenfeld, and Carleen Stoskopf. 2021. "Impact of Housing Instability and Social Risk Factors on Food Insecurity Among Vulnerable Residents in San Diego County," *Journal of Community Health* 46 (6): 1107–1114. <https://doi.org/10.1007/s10900-021-00999-w>.