Embedding an Equity Approach in HUD's Learning Agenda

Angela Glover Blackwell
Sarah Treuhaft
PolicyLink

Abstract

Achieving equity in housing means dramatically improving living conditions for the 23 million households in this country—disproportionately people of color who face the additional burdens of systemic racism—that experience housing insecurity and economic insecurity. To advance equity at the scale needed, HUD's Learning Agenda must both reach beyond the agency's current programs and constituents to inform the next generation of housing policy and approach every learning question with an equity lens. We offer three recommendations: (1) expand the scope to include questions that identify program and policy solutions that leverage contributions by other government agencies and other housing system actors; (2) adopt a framework for equity analysis that includes assessing multiple dimensions of equity (procedural, distributional, structural, and restorative), integrating deeply disaggregated data, and focusing on those households with the highest housing needs as a strategy to build a housing system that works for all; and (3) incorporate into the agenda key housing issues and solutions that are gaining traction at the community level and are being demanded by the housing justice movement, such as eviction prevention, social housing, rent stabilization, corporate ownership, and housing reparations.

Introduction

As an organization founded in 1999 with the mission of advancing racial and economic equity through policy and systems change, PolicyLink has been, at different times, an advocate, a coach, and a cheerleader for federal government agencies' adoption of an equity lens in their work. The U.S. Department of Housing and Urban Development's (HUD's) latest 5-year Learning Agenda exemplifies this practice, and we want to both celebrate that intention and offer suggestions for strengthening the agency's equity muscle.

The Equity Challenge

We define equity as just and fair inclusion into a society in which all can participate, prosper, and reach their full potential. When we think about how to manifest equity, we ask: what policy and systems changes are needed to positively transform the lives of the nearly 100 million people in this country who are economically insecure, including 53 million people of color who face the additional burdens of systemic racism? How do we implement these solutions effectively? Finally, does the voice, wisdom, and experience of those most impacted by inequity drive these solutions?

These 100 million people reside in 36 million households, and ensuring that each of them live in a quality, safe, affordable home is fundamental to achieving equity in America. Housing is a cornerstone for health, well-being, and economic success. The home and neighborhood you live in play a significant role in determining your access to opportunities and life outcomes. Decades of research demonstrate that neighborhoods with "opportunity structures"—high-quality schools, safe streets, clean air, parks, reliable transit, and proximity to jobs, retail, and services—promote positive life outcomes. On the other hand, living in a neighborhood that lacks these essential conditions can have negative impacts on health, access to educational and economic opportunities, and economic outcomes—particularly for children (Acevedo-Garcia, Noelke, and McArdle, 2020).

Economically insecure households—especially households of color—face immense and growing challenges in accessing quality, safe, affordable homes in opportunity-rich neighborhoods. The majority of economically insecure households are renters (59 percent), and renting is more common among households of color; for example, 73 percent of Black households are renters.[1] Across all racial/ethnic groups, a large majority of economically-insecure renter households—77 percent—spend too much of their already-strained household budgets on rent and utilities, leaving them with far too little to spend on the rest of their household needs (National Equity Atlas, 2022a).[2] Residential segregation is just as bad now as it was in 1990 (Menendian, Gambhir, and Hsu, 2021). Many renters living on low incomes lost work and income during the pandemic, and they either accrued debt to stay current on rent or fell behind (National Equity Atlas, 2022b). In 2021–22, rents have skyrocketed in most metropolitan regions, and the price of gas and other household necessities has also increased (Bhattarai, 2022). Evictions, which negatively impact health, education, household finances, and future prospects, are commonplace among the most economically insecure renters, especially women of color with children, and they are on the rise in many metropolitan regions in the post pandemic emergency moratoria era (Hepburn et al., 2022).

The challenges cited above are the challenges that we face as a nation in creating a housing system that meets the needs of the 100 million who are economically insecure; they are the challenges that

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[1] PolicyLink analysis of 5-year 2019 American Community Survey data on Tenure. Among economically-insecure households, 73 percent of Black households, 70 percent of mixed-race households, 68 percent of Latinx households, 65 percent of Asian and Pacific Islander households, and 57 percent of Native American households rent, compared with 50 percent of White households.

[2] Rent burdened is defined as paying more than 30 percent of household income on rent and utilities. Note that there are some racial differences: among economically-insecure renter households, 67 percent of Native American households and 75 percent of White households are rent-burdened, compared with 81 percent of Asian or Pacific Islander households, 79 percent of Black households, 78 percent of multiracial households, and 77 percent of Latinx households.

the U.S. Department of Housing and Urban Development (HUD) must take on to advance racial and economic equity at a meaningful scale.

How Equity Shows Up in HUD's 2022–26 Learning Agenda

Ushered into office during a global pandemic that spotlighted systemic inequities alongside a racial reckoning, precipitated by uprisings following the police murder of George Floyd, President Biden's very first Executive Order, "On Advancing Racial Equity and Support for Underserved Communities Through the Federal Government," made advancing equity the official policy of the federal government and instructed executive departments and agencies to "recognize and work to redress inequities in their policies and programs that serve as barriers to equal opportunity" (The White House, 2021).

For HUD, embracing an equity approach is not a novel endeavor. Under the Obama Administration, HUD doubled down on its mission to "Affirmatively Further Fair Housing," piloted a "Fair Housing and Equity Assessment" tool to help communities measure and address racial disparities in access to opportunities, and implemented the Sustainable Communities Initiative, a competitive grant program with a focus on equitable community engagement in regional planning efforts. The Trump Administration stalled this forward progress, however, revealing the impact of vacillating executive-level political priorities on federal agencies. But even without this political roadblock, embedding equity into the mission of an agency like HUD that has more than 7,000 employees spread across more than a dozen different offices is a significant undertaking that will take years, if not decades, to accomplish.

HUD's strategic plan, its proactive approach to developing a racial equity action plan in response to the Executive Order, and its 2022–26 Learning Agenda demonstrate that the agency has begun integrating an equity approach into its mission.[3] The strategic plan takes the important first step of naming increasing equity across all programs as one of two overarching agency-wide goals, alongside improving customer service. The plan also identifies many equity-focused strategic goals, including advancing housing justice, reducing homelessness, investing in equitable community development and wealth-building (particularly for communities of color), strengthening environmental justice, and integrating health and housing.

The Learning Agenda draws connections to HUD's work to institutionalize an equity focus throughout its operations, and it includes learning questions that address four equity topics: (1) addressing homeownership and wealth-building; (2) addressing the health needs of residents in HUD-assisted properties; (3) understanding whether recipients of HUD funding are affirmatively furthering fair housing (AFFH); and (4) filling data gaps. While not explicitly identified as an equity topic, we emphasize that the Learning Agenda also includes questions related to automated decisionmaking in housing markets, which is an important new frontier for discrimination and therefore a critical area of equity inquiry (Schneider, 2020).

[3] In the fall/winter of 2021 and 2022, HUD participated in a Racial Equity Governing Pilot Project led by PolicyLink and Race Forward, which focused on supporting agencies to fulfill the Racial Equity Executive Order.

These are important learning questions that can generate actionable information to increase equity through HUD's operations. We see several ways that HUD can more firmly center equity throughout its Learning Agenda.

Recommendations for Strengthening the Equity Focus of HUD's Learning Agenda

To advance equity at scale, HUD's Learning Agenda must both reach beyond the agency's current programs and constituents to inform the next generation of housing policy and approach every learning question with an equity lens. We offer the following recommendations.

Learn at the Scale Needed to Achieve Housing Justice

A more broadly scoped learning agenda would better position HUD to envision and then manifest the policy and systems changes needed to achieve housing justice. The current Learning Agenda includes many very good research questions about the effectiveness of its existing programs and the ways that pandemic response programs such as eviction moratoria and emergency rental assistance can inform future programming. While the Agenda includes a few questions about potential new programs, by and large it focuses on learning from program implementation and understanding contextual factors to inform program and policy design. This is a logical and grounded approach to incremental policy improvement, and it is insufficient to meet our housing equity challenge at scale.

As described previously, there are 36 million economically insecure households in America. Taking housing unaffordability as an overarching challenge that must be addressed, as of 2019, there were 23 million economically insecure households paying unaffordable rent or mortgages (more than 30 percent of their income) (National Equity Atlas, 2022a).

Achieving housing equity means securing safe, quality, affordable housing in opportunity-rich neighborhoods for all of these households, yet millions of these households are not touched at all by HUD's programs. In 2017, HUD directly served about 5 million households through its voucher and public housing programs, which are targeted to extremely low-income households, and only one in four households that qualify for federal housing assistance receives it (Fischer, Acosta, and Gartland, 2021). The Low-Income Housing Tax Credit produces about 110,000 units per year (Scally, Gold, and DuBois, 2018). While no precise data exists about the households living in federally financed buildings, it is clear that HUD assists many households through its role in housing financing. The Urban Institute estimates that the Federal Housing Administration, Fannie Mae, and Freddie Mac back the mortgages of about 12 million housing units (Goodman, Kaul, and Neal, 2020).

Given HUD's relatively limited reach into the 23 million economically insecure and housing-burdened households, to make measurable progress on equity, HUD will need to expand its impact on this population or use its influence to convince other housing system actors to take actions that contribute to meeting housing needs. Therefore, its Learning Agenda needs to include questions that help identify program and policy solutions that allow the agency to reach beyond its current constituency and leverage contributions by other government agencies and other housing systems actors.

Embed an Equity Analysis Throughout the Research

To truly become an equity-maximizing institution, HUD should integrate an equity analysis throughout its research. We recommend adding a section to future learning agendas that describes HUD's analytical approach to assessing equity across all of its learning questions.

This approach should include a framework for analyzing the multiple dimensions of housing equity. The Urban Sustainability Directors Network, the Urban Institute, the Kinder Institute, and others have begun articulating a multidimensional framework for analyzing equity across a range of policy arenas that can readily be applied to housing policy (Buchanan and Rivera, 2020; Kilolu, 2020; Stern, MacDonald, and Odeh, 2020). These include:

- *Procedural equity*—The groups that are most negatively impacted by inequities and structural racism are inclusively and meaningfully engaged in designing and implementing housing policies and programs and gain power, voice, and authority.

- *Distributional equity*—Housing programs and policies distribute benefits and burdens equitably across communities, providing maximum benefits to those with the greatest needs.

- *Structural equity*—Housing institutions and systems have processes, practices, and policies in place that operationalize equity in decisionmaking.

- *Restorative equity*—Policymakers acknowledge systemic harms—past and ongoing—against certain people and ensure commensurate investments to repair those harms.

HUD's equity research approach should include at least two other analytical foci:

- Deeply disaggregating data by race/ethnicity, ancestry, gender, income, geography, and other characteristics to understand the scope and scale of inequities and develop effective remedies. Data by ancestry in the National Equity Atlas, for example, reveal how Vietnamese, Cambodian, and Korean renters have similarly high rates of rent burden as Black and Latinx renters, although Asian renters as a whole have far lower rates of rent burden (National Equity Atlas, 2022a).

- Analyze how to serve those with the highest housing needs as a strategy to build a housing system that works for all. We know, for example, that low-income Black women with children face alarming rates of eviction that cause even greater economic insecurity (Desmond, 2014). Latina women have also faced the greatest threats of eviction during the pandemic (Wedeen, 2021). It is also important to understand and address intersectional vulnerabilities, or the overlapping barriers faced by individuals or groups that face discrimination and barriers across multiple identities, such as race, gender, and disability status. Implementing strategies that meet the housing needs of the most marginalized can create a ripple effect of cascading benefits which we call the "curb cut effect" (Blackwell, 2017).

Focus on Additional Topics Critical to Advancing Equity in Housing

In addition to broadening the Learning Agenda to inform larger scale policy solutions that engage additional systems players, HUD should expand its Learning Agenda to incorporate key housing issues and solutions that are gaining traction at the community level and are being demanded by the housing justice movement. While the only authentic way to align this Learning Agenda with the aspirations of the grassroots movement is through an inclusive process, from our vantage point as an intermediary and movement-support organization, we offer the following suggestions for important and missing topics:

- Eviction prevention, including in public housing managed by HUD, as well as private housing. While the Learning Agenda examines pandemic response eviction protections for nonpayment of rent, there are no questions relating to the prepandemic eviction epidemic, although public housing authorities are oftentimes the largest evictors in communities.

- Social housing (owned and operated by government and nonprofit organizations) as a strategy to increase the supply of affordable homes, and policy and financing strategies to build it at scale.

- Strategies to preserve affordable and subsidized housing in perpetuity.

- The potential for rent stabilization and tenant protections to increase housing stability for low-income renters in the private housing market.

- Informing state and local reparations programs that focus on acknowledging the harms of racist housing policies and implementing remedies.

- Understanding the impact of corporate landlords on equitable access to quality, safe, affordable housing.

HUD's new Learning Agenda offers an exciting opportunity to deepen the agency's equity analysis and, ultimately, improve housing conditions for the 23 million households that are both economically insecure and housing-burdened in America. We hope the suggestions we have offered support the agency in delivering on its equity goals.

Acknowledgments

Authors

Angela Glover Blackwell is Founder in Residence at PolicyLink. Sarah Treuhaft is Vice President of Research at PolicyLink.

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