



OPEN COMMUNITIES ALLIANCE

Embracing Diversity to Strengthen Connecticut

April 10, 2015

Commissioner Evonne Klein
and Deputy Commissioner Nick Lundgren
Department of Housing
505 Hudson Street
Hartford, CT 06106

Dear Commissioner Klein and Deputy Commissioner Lundgren:

For over 13 years, starting before mobility counseling was more widely known as an effective strategy for affirmatively furthering fair housing and fostering housing choice, the State of Connecticut has supported a modest mobility program. The Department of Housing is to be commended for early leadership in this area. However, as you consider program elements for the forthcoming Request for Proposals to administer the program, we urge you to reformulate the Connecticut initiative to bring it into better alignment with the emerging best practices in the area. Below, Open Communities Alliance provides recommendations for doing so. We also offer Housing Choice Voucher (HCV) and Rental Assistance (RAP) program-wide strategies for ensuring that Connecticut's tenant-based government housing subsidy programs more broadly promote access to opportunity, which, as you know, is required under the Fair Housing Act.¹

In brief, three broad components are needed to create a comprehensive and successful mobility counseling program:

- (1) Opportunity Mapping Measures.** Adoption of measures of program success defined by opportunity mapping research and focusing on moves to high and very high opportunity areas are critical. Opportunity mapping for Connecticut, which uses a number of neighborhood assessment data points to evaluate opportunity by census tract across five levels – very low, low, moderate, high and very high - is fully described and available at http://www.ctoca.org/introduction_to_opportunity_mapping. In this letter high and very high opportunity areas are referred to collectively as “higher opportunity areas.” The statewide map is available in Appendix A.
- (2) Enhanced Program Benefits.** Elsewhere in the country mobility counseling programs incorporate financial support for security deposits, moving costs, and application fees. Connecticut's program should do likewise. One of the most important benefits the Department could bring to the Connecticut program is allocating RAPs specifically for families making successful mobility moves. These and other recommended program benefits are described in detail below.
- (3) Full Funding.** The Connecticut program receives a per-moving-client-allocation of half or less of allocations in other mobility counseling programs. The Connecticut program cannot be successful unless it is adequately funded. The estimated cost of an initial program helping 300 families move is about \$1.2 million a year.

¹ 42 U.S.C. Sec. 3604 and 3608.

Access to Opportunity and Segregation within Government Housing Subsidy Programs

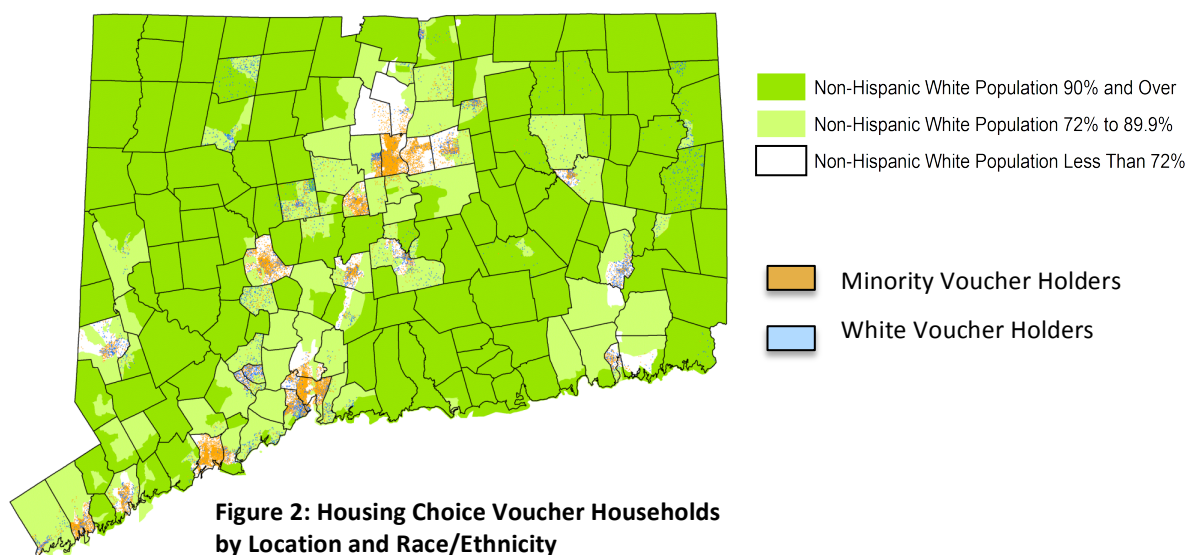
As DOH's recently-released *Connecticut Analysis of Impediments to Fair Housing* (2015) documents, Connecticut is one of the most racially, ethnically, and economically segregated states in the country. With segregation comes isolation from the building blocks to success in life and stark negative outcomes by race and ethnicity (such as diminished health and the educational achievement gap).

To address this, Connecticut must not only bring additional resources to struggling areas, but also ensure true choice in housing throughout the state. Years of research from around the country, and data from Connecticut (see Figures 1-4), demonstrate that without *fully-funded* mobility counseling (including robust standards), many people using housing subsidies view high poverty, low opportunity areas as their only option.

Figure 1: CT Housing Choice Voucher Holders (HCV) by Location and Minority Status (by tracts)²

CT Housing Choice Voucher Holder Race/Ethnicity	% HCV in Disproportionately Minority (30% or >) Areas	% HCV in High Poverty Areas (9.2% or >)	% HCV in Racially & Ethnically Concentrated Areas of Poverty (50% or > minority + 3x regional poverty)
Land Area of CT	5.8%	10.5%	<1%
All Voucher Holders	83%	79%	33%
Minority Voucher Holders	92%	85.5%	40%
Non-Hispanic White Voucher Holders	62%	65%	15%

In Connecticut the connection between tenant-based housing subsidy location and access to opportunity is stark. A 2012 report by the Furman Center and the Poverty and Race Research Action Council found that the New Haven and Hartford areas ranked 97th and 99th worst, respectively, in a nationwide assessment of whether tenant-based housing choice voucher holders were living near high performing schools.³



² Connecticut Analysis of Impediments to Fair Housing Choice 2015, at 153. Map at 154.

³ Ingrid Gould Ellen, Keren Mertens Horn, *Do Federally-Assisted Households have Access to High Performing Schools?*, Furman Center at NYU and Poverty and Race Research Action Council, November 2012, <http://furmancenter.org/files/publications/PRRACHousingLocationSchools.pdf>.

Figure 3: Rental Assistance Program by Location (by town) ⁴				
Development Type	Certificates	% Units in Disproportionately Minority Towns	% Units in High Poverty Towns	% Units in RCAP Towns
All	3,182	85%	75%	75%

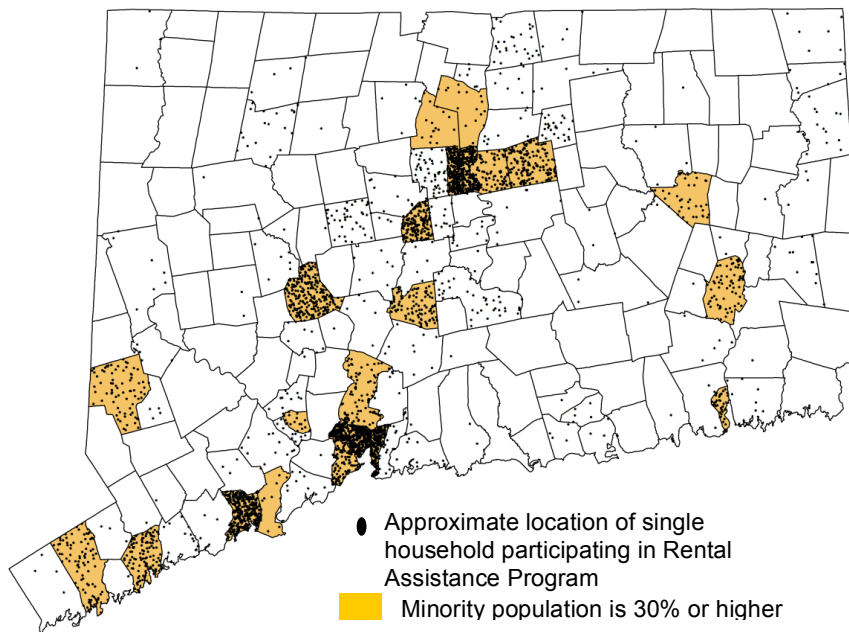


Figure 4: Rental Assistance Program Participant Location by Area Minority Composition

There is an array of barriers to housing choice for HCV holders and RAP recipients interested in moving to higher opportunity communities. These include lack of affordable housing in the majority of Connecticut’s cities and towns, and rampant “source of income” discrimination. We recognize that the Department is taking some steps to address both of these obstacles. A third and critical policy solution is mobility counseling.

Mobility Counseling

What is Mobility Counseling?

Mobility counseling is a combination of tools that address the barriers HCV and RAP recipients face when searching for housing outside of lower opportunity areas. These tools include financial assistance with security deposits, application fees, and moving expenses. They can also include help with credit repair and counseling assistance on the benefits of a mobility move, and help connecting to basic services (transportation, childcare, etc.) and assets (schools, parks, grocery stores, religious institutions) in a new neighborhood.

⁴ Analysis of Impediments 2015, at 149. Map at 149.

Perhaps the most important aspects of mobility counseling are assistance with actually locating a new home in a higher opportunity community and post-move assistance with landlord interaction and acclimating to a new community.

What Mobility Counseling is Not

Since many people – even some advocates – are unclear about what is actually involved in mobility counseling, it is also important to clarify what mobility counseling is not.

- *Mobility counseling does not mandate anyone to live in particular places.* Mobility counseling programs are available to families who indicate an interest in moving to higher opportunity neighborhoods. Once such families have committed to make this kind of move, a mobility counseling program provides the critical tools for achieving this goal. These tools include the information on why this might be a beneficial choice, how to undertake a search, credit repair and other rent-readiness assistance, and help with the search itself. It is particularly important to provide these kinds of tools to families interested in mobility moves because the units in higher opportunity communities are harder to locate and landlords are more likely to be unfamiliar with government housing subsidy programs and requirements.

Many mobility counseling programs also provide benefits that act both as means of offsetting the clients' time invested in the program (e.g. sessions with counselors and search times that may be longer) and overcoming the roadblocks to obtaining housing in higher opportunity areas. These program benefits can include financial assistance with application fees, moving costs, security deposits, and enhanced rent subsidies designed to reflect rental costs in higher opportunity markets.

Some programs, like the strong program in Baltimore, MD, provide specialized mobility vouchers available to program participants. Like most Housing Choice Voucher programs run by housing authorities in Connecticut, the Baltimore mobility vouchers come with a requirement to stay in the new area for a year.

Benefits such as these are critical to creating the high-functioning mobility counseling programs necessary to countering decades of policies that limited where people of color could live in Connecticut. They lie at the core of the state's obligation to affirmatively further fair housing.

- *Mobility Counseling is Not Generalized Search Assistance.* To be very clear – mobility counseling is not generalized apartment search assistance for anyone using a government housing subsidy. Mobility counseling is a service that recognizes that there are program participants who want to move to higher opportunity communities but face innumerable barriers, many of which result from Connecticut's long history of residential racial segregation, that hinder them from achieving this goal. It does not make sense to spend the kind of money required to do high-quality mobility counseling on basic search assistance to help program recipients find housing in areas where they are currently already finding units. If DOH needs to increase its HCV and RAP utilization rates more generally, it should establish a less costly search assistance component to assist with that. Mobility assistance is a separate program with explicit affirmatively furthering fair housing goals.

Why Mobility Counseling is Essential?

From racial covenants that barred people of “any race except the white race” from living in certain areas “except if they are a domestic servant,” to redlining, Jim Crow laws and many more, the White establishment – through government-sponsored or sanctioned policies – has dictated where families of color lived in Connecticut and elsewhere in the country.⁵ This pattern continues in less blatant, more structural ways to this day with the over-concentration of government subsidized housing in disproportionately minority areas and “recommended” landlord lists that direct government

housing subsidy recipients almost exclusively to high poverty, minority-concentrated areas. *The 2015 Analysis of Impediments to Fair Housing Choice* indicates that of the Department of Housing’s landlord recommendations over 90% are in disproportionately minority census tracts, and over 78% are in disproportionately high poverty census tracts.⁶

Mobility Counseling’s Record of Success

A large and growing body of research links moves made possible through the help of mobility counseling to improvements in educational attainment for low-income children, increased graduation and college attendance rates, and improved physical and mental health for voucher holders and their families.⁷ These will all translate into cost savings for the state in the form of lower per pupil education costs for low-income students and reduced health expenditures on things like emergency room visits for preventable asthma-related issues.⁸

In Baltimore, for example, parents report fewer asthma attacks experienced by their children after moving to a suburban neighborhoods.⁹ After being in their new neighborhoods for at least 14 months, 89% of parents report that their children are learning better in school.¹⁰ Maps of Baltimore’s mobility counseling outcomes are below in Figure 5.

⁵ Redlining and racial covenants are discussed in Jack Dougherty, *On The Line: How Schooling, Housing, and Civil Rights Shaped Hartford and Its Suburbs*, <http://epress.trincoll.edu/ontheline2015/chapter/federal-lending-and-redlining/>. Jim Crow laws are discussed in Douglas S. Massey and Nancy A. Denton, *American Apartheid: Segregation and the Making of the Underclass*, (Harvard College: 1993), 28.

⁶ Analysis of Impediments 2015, at 157.

⁷ Patrick Sharkey, *Stuck in Place: Urban Neighborhoods and the End of Progress toward Racial Equality* (Chicago: University of Chicago Press, 2013); Heather Schwartz, “Housing Policy is School Policy,” <https://tcf.org/assets/downloads/tcf-Schwartz.pdf>; Jennifer Darrah and Stefanie DeLuca, “‘Living Here Has Changed My Whole Perspective’: How Escaping Inner-City Poverty Shapes Neighborhood and Housing Choice,” *Journal of Policy Analysis and Management*, Vol. 33, No. 2 (2014): 350–84.

⁸ *Exploring the Social Determinants of Health*, Robert Wood Johnson Foundation, Issue Brief #8, May 2011, http://www.rwjf.org/content/dam/farm/reports/issue_briefs/2011/rwjf70450.

⁹ Lora Engdahl, “New Homes, New Neighborhoods, New Schools: A Progress Report on the Baltimore Housing Mobility Program,” PRRAC, <http://www.prrac.org/pdf/BaltimoreMobilityReport.pdf>, 29.

¹⁰ *Id.* at 29.

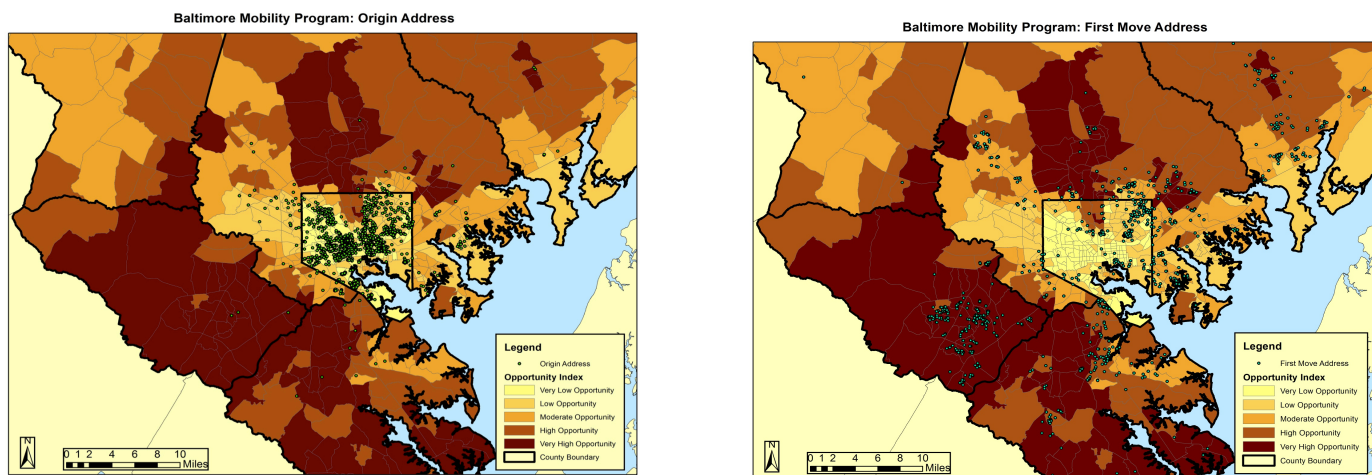


Figure 5:

Baltimore Before Mobility Counseling

Baltimore After Mobility Counseling

Baltimore – Pre- and Post-Counseling voucher locations over an 8-year period. These special vouchers were available only to families making mobility moves. Map provided courtesy of Professor Stefanie DeLuca, Johns Hopkins University.

Connecticut's Mobility Counseling Program

As you know, since 2002 the State of Connecticut Department of Housing has used Housing Choice Voucher administrative funds to support a mobility counseling program for its voucher holders and RAP recipients. The program was born out of a 2001 administrative complaint brought against the Connecticut Department of Social Services (DSS) by the ACLU of CT and legal services offices claiming that its government housing subsidy program was being run in a manner that fostered segregation and violated Conn. Gen. Stat. § 8-345.

The three contractors for this program are essentially meeting the low thresholds set in the current contract (see Figure 6), but, due to these low expectations and underfunding, the program is not generating the full housing choice and integrative results that were intended in the resolution of the 2002 administrative complaint.

Figure 6: Contract Goals, 2010-2013 ¹¹		Contractor Performance
A moves (moves to areas with less than 15% poverty)	40%	38%
B moves (moves to areas with between 15 and 30% poverty)	40%	39%
Moves to areas with poverty rate over 30%	20%	23%
C moves (moves with a decrease in the poverty rate of at least 10%)	25%	26%

¹¹ Analysis of Impediments at 122.

Very high percentages of program participants from major minority and poverty-concentrated cities stayed there after counseling:

- Bridgeport: 90%
- Hartford: 70%
- New Haven: 80%¹²

In addition, and most tellingly, 90% of “mobility moves” were to disproportionately *minority* areas.¹³

Getting the Connecticut Program Back on Track

Connecticut’s mobility counseling program is outdated and must be improved in three ways to reflect current national best practices:

- (1) *More Robust Measures of Success.* The current mobility counseling contract uses *poverty* measures to define success, with the most difficult-to-make moves - “A” moves - defined as places with less than 15% poverty. Successful mobility moves need to be defined in a more nuanced way. Researchers found that even a “success” definition of 10% poverty or less did not yield the best results in HUD’s Moving to Opportunity experiment.¹⁴ The reason for this is, in part, that families moved to areas with lower poverty but with other characteristics that mirrored their original neighborhood – like struggling schools. In Baltimore and Dallas more robust measures are used (such as areas with less than or equal to 5% family subsidized housing and schools ranked as high performing) and yield more meaningful moves. The plan in Baltimore is to shift to using opportunity mapping to measure success.

Opportunity Mapping Goals: Open Communities Alliance recommends defining “success” by using opportunity mapping, which has recently been updated for Connecticut by the Kirwan Institute, the CT Fair Housing Center, and OCA. The mapping is based on data that are reliable for at least the next five years and are easily updated using publically-available data sources. We recommend the following definitions of success:

- 80-100% of clients moving move to high and very high opportunity areas.
- Allowance for 10% of clients moving to moderate opportunity areas from lower opportunity areas after also searching in higher opportunity areas.
- Allowance for 10% one-level “step up” in opportunity (e.g. from very low to low opportunity) after also searching in higher opportunity areas.

Moderate opportunity moves are *not* prioritized in these recommendations is because it is simply bad policy to design a state program to bring more low income families to areas that are facing challenges and, in many cases, just holding on to the local characteristics that allow them to be decent, safe places to live. Bringing more low-income families to such areas may put the neighborhoods at risk and lower the chances of success for moving families.¹⁵ At the same time, some mobility clients need to take “baby” steps before they make a leap to a higher opportunity area and the proposal set forth here allows for that.

¹² Id.

¹³ Id.

¹⁴ Sharkey at 134. Sharkey attributes this in part to families moving back to their neighborhood of origin, but also to increases in poverty in the receiving neighborhood. That is why mobility programs benefit from targeting neighborhoods that are thriving according to nuanced measures that go beyond poverty measures.

¹⁵ Sharkey at 174.

The Department also might consider creating bonus incentives for the contractor(s) to help meet these goals.

Clients Served Goals: To address historic patterns of housing inequity, many more clients must have access to high-quality mobility counseling. OCA suggests that, initially, the mobility counseling program help at least 300 families move each year. This is a low number considering the Baltimore's Housing Choice Voucher program (including the mobility component) facilitates 400 mobility moves and oversees 28,931 vouchers, compared to 33,715 HCVs and RAPs administered by DOH. The number of clients assisted should be increased in the future.

Elsewhere in the country, *depending on program benefits*, between 20% and 40% of clients who receive mobility counseling end up making successful moves to opportunity. Using the 30% average of those rates, a reasonable goal in Connecticut would then be to serve 1,000 clients annually in such programs, with the expectation that 300 families would then make successful moves. For the remaining 70% of clients, OCA recommends that the program provide a basic pamphlet including information on the importance of housing choice, housing search and rent-readiness guidance, and a listing of services (like fair housing assistance).

- (2) *Improved Tools for Overcoming Barriers.* OCA recommends that the Department create "Mobility RAPs," specialized RAPs available to families who make a mobility move and stay in their new location for one or two years. The program would also benefit from an allocation to and administrative oversight by the contractor of an appropriate number of Security Deposit Guarantees (with another agency responsible for post-move administration). Other essential program benefits are outlined in the chart below.
- (3) *Increased Allocations per Moving Family.* Based on our best estimate, the current Connecticut mobility counseling program averages a payment of \$1,962 per successful mobility move, excluding the cost of the Housing Choice Voucher or RAP certificate. Based on conversations with mobility counseling programs elsewhere in the country, a minimum per-moving-client cost for an effective mobility counseling program is around \$4,000, excluding the cost of the housing subsidy and security deposit assistance. Thus, an appropriate annual cost for such a program in Connecticut is \$1.2 million (assuming 300 mobility moves/year).

Recommended Changes to the Mobility Counseling Program	
Increased funding	\$4,000 per mobility move; 300 families moving annually; 1000 families in program in first year, and increasing thereafter.
More comprehensive definitions of a “successful” move	Use “Opportunity Mapping” rather than simply poverty concentration. Successful moves = 80-100% of moves to high or very high opportunity areas. Allowance for a maximum of 10% of moves from lower opportunity areas to moderate opportunity areas and 10% of moves to increasing at least one opportunity level. Consider a bonus system for exceeding these targets.
Increased search times at counselors’ discretion	Defer to mobility counselors’ judgment within certain extension guidelines.
Dedicated mobility vouchers/RAPs	Made available to families who actually make successful mobility moves and who stay in the new neighborhood for 1-2 years. 300 RAPs Potential increase above 300 RAPs in later years.
Enhanced rents	Includes an allowance of 10% over RAP amounts for units with 3 or more bedrooms, or for handicap-accessible units, which are currently difficult for voucher holders and RAP recipients to afford.
Dedicated Security Deposit Guarantee (SDG) Access & Administration	Allocate the requisite number of SDGs for mobility moves and give mobility counselors administration of the disbursement of the guarantees (the back-end collection functions should be administered elsewhere).
Enhanced outreach to current voucher holders & RAP recipients about mobility	Minimum of 30 minutes for a single presentation about mobility at orientations, including playing videos describing the experiences of participants in programs elsewhere in the country. Involving past program participants in the presentation. With client consent, sharing client data to allow for additional forms of contact, including text messages.
Post-move and second-move assistance	Additional counseling provided to voucher holders and RAP recipients to help them stay in higher-opportunity areas. Such services may require additional expenditures.
Greater financial assistance for moving voucher holders	Move financial assistance – \$300 (included in program costs) Application fee assistance – \$100 (included in program costs)

Broad Changes to RAP and HCV Programs for All Participants

In addition to improving the mobility counseling program to better promote housing choice, the entire RAP and HCV programs should be changed to include affirmatively furthering components that would help assure that the program meets the federal requirements. OCA continues to explore innovative approaches to do this, but a few ideas include:

- *More geographically diverse recommended property lists.* As referenced above, 90% of the recommended properties provided by DOH to its RAP and HCV program participants are in areas that are disproportionately minority. This is functionally unlawful steering and a factor contributing to segregation in the programs. We recommend that the Department invest the time and energy in developing more geographically diverse lists.

Likewise, we recommend that DOH assess the listings on CT Housing Search on the Department's website to ensure that this search assistance tool provides a geographically well-rounded menu of housing options.

- *Stress the Opportunity Choice.* In literature shared with RAP and HCV clients and in orientations for the programs, the option of moving to higher opportunity areas should be stressed as a choice to consider. Open Communities Alliance would be happy to work with the Department in developing such material.
- *Rent Study.* One factor cited by clients with whom we have worked as limiting their choice is that program rents are insufficient to afford higher opportunity area rents, especially for larger bedroom and accessible units. We recommend that the Department conduct a study determining if this is the case and consider increasing program rents, and, where necessary, obtaining rent exceptions from HUD, to allow access to a wider geography of housing.

Thank you for this opportunity to comment on the mobility counseling program. We would be happy to discuss our recommendations if that would be helpful.

Sincerely,

/s/

Erin Boggs, Esq.

Executive Director

Appendix A: 2015 Opportunity Map of Connecticut

