



Work Requirements in Public Housing Authorities

Experiences to Date and Knowledge Gaps

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The administration's May 2017 budget proposal (OMB 2017) would attach work requirements to the receipt of housing assistance, citing those requirements as a mechanism to promote work among unemployed residents receiving federal housing assistance—that is, those who live in public housing or have a Housing Choice Voucher to be used in privately owned units.¹ To date, limited information is available about housing agencies' use of work requirements for those who are receiving federally funded housing assistance, which models are best at meeting the stated goals of public housing agencies, what these approaches cost, and how work requirements are likely to affect the low- and very low-income households who are subject to them and who depend on housing assistance.

This brief begins to address these gaps by providing the first look at how Moving to Work (MTW) housing agencies, agencies that the US Department of Housing and Urban Development (HUD) has granted the authority to test housing assistance reforms, have been implementing work requirements. We use the reports these agencies submitted to HUD in fiscal year 2015 to examine their activities. We (1) describe the different work requirement approaches these agencies have tried, including whether they provide services and supports for those tenants subject to requirements; (2) estimate the percentage of households affected by work requirements; and (3) highlight the lack of evidence that work requirements improve resident employment and income outcomes.

We find that experimentation has been limited: only nine housing agencies had these types of requirements in 2015, and we estimate a very small share of the tenants served by those agencies are subject to the requirements. Available research provides no evidence on whether agencies are enforcing compliance with work policies or the number of households affected by such enforcement. The only rigorous evaluation, a study of the Charlotte Housing Authority's work requirement policy, shows modest effects on employment and little impact on income (Rohe, Webb, and Frescoln 2016).

In the remainder of this brief, we discuss what we learned from our analysis of the available data and what they tell us about adults who are subject to the work requirement and the types of policies that housing agencies are implementing. We then propose an agenda for learning more about work requirements that are tied to housing assistance and the key questions to consider before moving forward with a national policy.

History of Work Requirements in Public Housing Authorities

Since the late 1990s, HUD has designated 39 of the nation's approximately 3,000 housing authorities as MTW agencies. MTW is primarily a deregulation experiment that gives participating agencies the ability to use HUD funds originally designated for public housing operations, capital improvements, and vouchers to implement policies focused on helping families move toward self-sufficiency (among other objectives).² Having flexible funding allows these agencies to pay for services associated with workforce programs or activities associated with the other objectives. HUD is planning to expand MTW authority to another 100 housing authorities. In the face of shrinking federal dollars for public and assisted housing, housing authorities see MTW as a way to deploy their funds more efficiently to address local needs. Many agencies that receive MTW designation likely will consider implementing a work requirement policy. In fact, one cohort of newly designated agencies will be required to implement some type of work requirement policy.³ But although some MTW agencies have been implementing work requirement policies for more than a decade, no systematic evaluation or attempt has been made to analyze what the impact has been on residents' work engagement, incomes, or housing stability or on agency administrative costs.

Purpose of Work Requirements in Public Housing Authorities

Work requirements are intended to increase employment and income among public housing residents and voucher recipients, ultimately aiming to increase self-sufficiency and encourage movement off housing assistance (Falk, McCarty, and Aussenberg 2014; Fischer 2016; Rohe, Webb, and Frescoln 2016; Webb, Frescoln, and Rohe 2015). Increasing employment rates among assisted households can raise household income and support economic stability and mobility. Assuming income and economic stability increase, households are expected to achieve self-sufficiency, a term HUD uses to mean that a household is preparing to move off assisted housing. Pairing work requirements with housing assistance also addresses a concern that housing assistance might become an entitlement. The work requirements that the nine MTW agencies have developed incorporate consequences, sometimes including eviction, for households that do not meet the obligations.

Elements of Existing Work Requirement Policies

Our review of the nine MTW agencies with work requirements finds that their approaches often take the form of a mandated occupancy policy that requires the head of household and all other adult household members to earn income through part- or full-time work unless they are a full-time student, elderly, or disabled. Because work requirements fall under the umbrella of occupancy policies, noncompliance could lead to termination of housing assistance.

Of the nine housing agencies that reported having work requirements in their annual MTW reports to HUD in 2015, the Lawrence-Douglas (KS) County Housing Authority has the longest-standing policy, having established its first work requirement policy in 1999. At the other end of the spectrum, the Lexington (KY) Housing Authority established its requirement in 2014. The nine housing authorities are diverse in size, ranging from serving 1,000 households (in Lawrence-Douglas County) to serving more than 76,000 households (in Chicago, IL). Four of the nine agencies are in the south, in HUD region 4. (See appendix A for agency and policy details and appendix B for an overview of the method for identifying work requirement details.)

Work requirements vary across housing agencies, which is expected given the flexibility that MTW allows agencies in tailoring policies to the local population. Some policy elements, however, are common across the nine agencies. Each has implemented work requirements for public housing residents who are not elderly or disabled and are generally deemed physically and mentally capable of engaging in work activities. One agency exempts parents with minor children from its work requirement, but this applies only in two-parent homes where one parent is employed. Seven of the nine agencies apply their work requirement to households with a voucher (though, in one case, only to households that “port,” or use their voucher to move, into the county). Six agencies implement their requirement for all public housing developments in their portfolio and for all housing voucher recipients; the other three target the requirements to a portion of developments and voucher households. All agencies specify the number of hours to be worked and define the activities that qualify as “work” in a written policy. All agencies also offer case management services, and several offer employment-related supportive services and opportunities as well. Table 1 illustrates the variation among work requirement policies.

TABLE 1

Features of MTW Public Housing Authorities' Work Requirement Policies

	Policy implementation date	Targeted programs	Household members affected	Hour requirements and work definitions	Work support services ^a
Atlanta Housing Authority	2005	Public housing, voucher	Nonelderly, nondisabled household members ages 18 to 61	Head of household: work 30 hours a week; other nonelderly, nondisabled adults: work or participate in school, job training, or part-time employment for 30 hours a week	Case management services
Housing Authority of Champaign County	2013	Public housing, voucher	Nonelderly, nondisabled household members ages 18 to 54	All household members: work 20 hours or more a week or be enrolled full time in a training or educational program that offers a certificate	Case management services
Charlotte Housing Authority	2013	Public housing	Nonelderly, nondisabled household members (no ages specified)	Head of household: work 15 hours a week, increasing to 30 hours; other adults: work a minimum 5 hours a week, increasing to 10 hours	Case management and supportive services
Chicago Housing Authority	2009	Public housing, voucher (pilot with 100)	Nonelderly, nondisabled household members ages 18 to 54 and those age 17 not attending school full time	All household members: work 20 hours a week or participate in employment-related activities (job training or educational programs that help obtain employment)	Case management services and workforce development programs
Delaware State Housing Authority	2000/2013 ^b	Public housing, voucher	Nonelderly, nondisabled household members (no ages specified); voucher holders porting into Delaware	All household members: work or participate in training or education program for 20 hours a week working or in training or education program (Tier I); work 30 hours a week (Tier II)	Case management services
Lawrence-Douglas County Housing Authority	1999	Public housing, voucher	Nonelderly, nondisabled household members ages 18 and older	All household members: work, seek work, or participate in training or educational programs leading to work for 15 hours a week; one adult in two-parent households with minor children: work 35 hours a week	Educational and training opportunities, funding for training
Lexington Housing Authority	2014	Public housing	Nonelderly, nondisabled heads of household	Head of household or spouse: work 37.5 hours (Self-Sufficiency I) or 20 hours (Self-Sufficiency II) a week	Mandatory case management

Louisville Metro Housing Authority	2007	Public housing and vouchers in the Clarksdale HOPE VI scattered-site units	Nonelderly, nondisabled household members	All household members: work 20 hours a week; requirement may be waived temporarily for full-time students enrolled in an accredited postsecondary educational institution	Mandatory case management
Housing Authority of the County of San Bernardino	2010	Public housing (in Maplewood Homes), ^c voucher (ports into county)	Nonelderly, nondisabled household members ages 18 to 61	All household members: participate in work-related activities (work or activities removing barriers to employment) for 15 hours a week	Pilot included resident service coordinator support and partnership with the County Workforce Development Board; no services for voucher ports

Source: MTW annual plans and reports, 2015.

Notes: MTW = Moving to Work.

^a Agencies' 2015 annual reports tend not to provide details on case management services. Information on work-specific services is inconsistent across agency reports.

^b Delaware State Housing Authority has two tiers of work requirements that were implemented separately.

^c San Bernardino's pilot work requirement site, Maplewood Homes public housing community, was converted to project-based voucher housing through the Rental Assistance Demonstration program in the summer of 2016, after which the work requirement was ended.

People Affected by Existing Housing Authority Work Requirements

Household members affected by work requirements in the nine MTW authorities included able-bodied, nonworking, and nonelderly heads of households (defined by most agencies as younger than 62). Eight of the nine agencies also require other able-bodied adults who are on the lease to work if they can. Note that the definition of “able-bodied” for housing assistance recipients generally is less restrictive than for other forms of federal assistance. Agencies vary in whether they verify applicants’ or tenants’ disability declarations or accept claims of disability without verification.⁴ Residents do not necessarily need to be receiving Supplemental Security Income to be considered disabled.

Because data on the number of households in the nine agencies subject to work requirements are not readily available, we use HUD’s Picture of Subsidized Housing database to estimate the percentage of households that would be subject to the requirements if agencies implemented policies for all public-housing and voucher-assisted households. Our estimate reflects the share of households that might be expected to work (based on their age and disability status) but appear to receive less than half their income from wages. We consider households that report receipt of Temporary Assistance for Needy Families (TANF), general assistance, or public assistance as a major source of income to be eligible. We consider households that report most of their income from wages to not be bound by work requirements because they already are working. Households that report other income sources, such as Social Security, Supplemental Security Income, and Social Security Disability Insurance we consider exempt because they are elderly or disabled.⁵

Table 2 shows the percentage of households in the nine agencies that reported welfare as their major source of income, representing our estimate of households in public housing that would be subject to the work requirements. The share of eligible households across these implementing agencies range from 0 to 7 percent for eight agencies. The Housing Authority of the County of San Bernardino is an outlier, with 34 percent of its public housing households reporting receiving cash assistance. Table 3, similarly, shows that very few households renting with a voucher would be subject to work requirements; the share of eligible households across the nine agencies ranges from 1 to 13 percent.

TABLE 2

Major Sources of Household Income in 2015 among Public Housing Residents

Public housing authority	Number of households in public housing ^a	Households where welfare is a major source of income ^b	Households where wages are a major source of income ^c	Households with other major sources of income ^d
Atlanta Housing Authority	4,084	0%	39%	55%
Housing Authority of Champaign County	347	5%	12%	77%
Charlotte Housing Authority	3,013	1%	33%	55%
Chicago Housing Authority	21,291	8%	23%	67%
Delaware State Housing Authority	478	7%	44%	45%
Lawrence-Douglas County Housing Authority	352	1%	36%	60%
Lexington Housing Authority	1,001	6%	49%	45%
Louisville Metro Housing Authority	3,948	3%	25%	70%
Housing Authority of the County of San Bernardino	1,062	34%	25%	41%

Source: 2015 data from “[Picture of Subsidized Households](#),” HUD, accessed January 11, 2018.

Notes: HUD = US Department of Housing and Urban Development; MTW = Moving to Work.

^a The Picture of Subsidized Households reports the number of households in public housing units while public housing authorities’ annual MTW reports use the total public housing households (not specifying number of units), leading to inconsistencies between the data sources for number of public housing households served.

^b Picture of Subsidized Households defines the term “welfare” as Temporary Assistance for Needy Families, general assistance, or public assistance. It defines “other major sources of income” as income other than wages and welfare. This category could include income from Social Security, Supplemental Security Income, Social Security Disability Income, or other nonwage, nonwelfare sources.

^c We use the percentage of households with wages as their major source of income to estimate the number of currently employed residents.

^d The Picture of Subsidized Households reflects data reported to HUD by public housing agencies. The shares of income by source may not total 100 percent presumably because of missing data. Again, we use the percentage of households with wages as their major source of income to estimate the number of currently employed residents.

TABLE 3

Major Sources of Household Income in 2015 among Residents Using Housing Choice Vouchers

Public housing authority	Number of voucher households	Households where welfare is a major source of income ^a	Households where wages are a major source of income ^b	Households with other major sources of income ^c
Atlanta Housing Authority	12,858	1%	33%	56%
Housing Authority of Champaign County	1,320	12%	51%	36%
Charlotte Housing Authority	5,890	1%	31%	53%
Chicago Housing Authority	52,180	3%	33%	54%
Delaware State Housing Authority	873	3%	12%	83%

Lawrence-Douglas County Housing Authority	773	2%	33%	62%
Lexington Housing Authority	2,377	2%	38%	53%
Louisville Metro Housing Authority	8,663	2%	27%	63%
Housing Authority of the County of San Bernardino	9,592	13%	26%	59%

Source: 2015 data from “[Picture of Subsidized Households](#),” US Department of Housing and Urban Development, accessed January 11, 2018.

^a Picture of Subsidized Households defines the term “welfare” as Temporary Assistance for Needy Families, general assistance, or public assistance. It defines “other major sources of income” as income other than wage and welfare. This category could include income from Social Security, Supplemental Security Income, Social Security Disability Income, or other nonwage, nonwelfare sources.

^b We use the percentage of households with wages as their major source of income to estimate the number of currently employed residents.

^c Picture of Subsidized Households reflects data reported to HUD by public housing agencies. The shares of income by source may not total 100 percent presumably because of missing data. Again, we use the percentage of households with wages as their major source of income to estimate the number of currently employed residents.

Outcomes for Residents

It is not possible to determine whether and how work requirements affect assisted tenants based on available data from the nine agencies’ 2015 annual reports to HUD. MTW housing agencies’ reports include data for public housing residents affected by agencies’ work requirements but do not include data for voucher holders. These agency-reported data include employment rates for 2015. Some agencies report changes in average household income and changes in the number of households receiving TANF between the agency’s baseline year and 2015. Data are incomplete, and whether the nine agencies report data consistently is unclear. To assess the outcomes and impact of work requirements for residents, we would need to check the quality of existing data and collect additional data.

Moving Forward

This analysis suggests several implications for a national policy on work requirements for housing assistance recipients.

Our estimate from nine agencies suggests that only a small share of housing assistance recipients, perhaps less than 10 percent, would be subject to work requirements as currently formulated. That small share means that such policies would have little impact on overall work effort. Further, those who are subject to work requirements may already face similar requirements tied to their TANF or Supplemental Nutrition Assistance Program benefits, meaning that expanding the policy would require coordination across programs. (For an overview of work requirements in social safety net programs, see Hahn et al. 2017.)

Data from the nine agencies' 2015 annual reports and the Picture of Subsidized Households database do not support an assessment of work requirements' effects on workforce participation or household income, so evidence is not available to know whether they help lift households out of poverty or transition off housing assistance.

The MTW reports show that housing agencies have experimented with different models of work requirements. All nine agencies offer case management, and four agencies offer more extensive workforce development support services. Because no evaluations of program costs or best practices have been published, we do not know how much these services might cost or what models might be the most effective.

Finally, we do not know whether housing agencies are imposing sanctions, such as termination of assistance, or the number of households sanctioned. Therefore, we are unable to assess the potential impact of a work requirement policy on recipients' housing assistance or stability. Given that most public and assisted households are extremely low-income, this issue is vital for understanding the potential for harm to vulnerable families.

With HUD on the verge of designating an additional 100 housing agencies as MTW, more agencies likely will implement work requirements. Policymakers must be able to access more and better information to guide policy in this area. We propose a research agenda that would draw on the experiences of these nine agencies to continue building the knowledge base and inform future policy decisions. This research agenda would address the following questions:

- **How much does the number of households eligible for work requirements vary across agencies, and what are the implications of that variation for housing agencies?** Our estimate of the share of households eligible for work requirements varies across the nine MTW agencies that have work requirements. That estimate in turn likely affects the level of need for supportive services. Because agencies typically pair supportive services with work requirements in recognition of the barriers many households face, cost implications likely will vary across agencies. Examining the actual numbers of eligible households by agency and the per household cost for policy implementation, including costs for administration and associated services, would inform debates on policy options.
- **What are the characteristics of tenants eligible for work requirements, and what supports would they need to increase their labor market participation?** Analysis of HUD and agency-specific data could provide information on residents' employment trends by age, race, gender, education, health, criminal and incarceration records, and other factors. This information would help identify any employment challenges and barriers faced by residents who otherwise appear eligible for work, and it would inform how best to target services and other work supports.
- **What are the outcomes and impact of current work requirement policies?** No cross-site studies examine the implementation and effects of public housing work requirements on households and agencies, and only one published study examines policy implementation and

effects for a single agency (Rohe, Webb, and Frescoln 2016). Worthwhile topics for study include the outcomes and impact of work requirements in housing on the following:

- » characteristics of tenants' jobs: the hours offered relative to work requirements, wage rates, benefits, and opportunities for advancement
 - » job tenure and employment stability: the length of time people maintain employment, the number of jobs held within a specified time frame, and the number and length of unemployment spells between jobs
 - » self-sufficiency: whether any changes in employment and income enable households to move off housing assistance
 - » housing stability and impact on children: whether work engagement among household adults has any longer-term effects on housing stability or any spillover effects on children
- **What are agencies' challenges and outcomes in work requirement policy implementation?** No published studies examine the administrative practices and costs of housing agencies' work requirements or details of supportive services partnerships, and no published studies address overlaps among housing and other safety net programs' work requirements. Insights are needed about the following:
- » administrative costs: staff time for managing implementation and compliance and developing of record-keeping systems
 - » supportive services: provision of policy-specific supportive services and other work supports, service delivery structure, costs of service delivery, and funding sources
 - » policy noncompliance: the rates of noncompliance, characteristics of noncompliant residents, consequences for noncompliance, and administration of consequences for noncompliance
 - » coordination with other work requirements: the percentage of agencies' tenants subject to housing work requirements who also are subject to work requirements through TANF, the Supplemental Nutrition Assistance Program, or other safety net programs, and coordination systems across programs
- **How do contextual factors affect the implementation and outcomes of work requirements?** Local job markets, transportation systems, and other factors will influence residents' ability to find and keep jobs. Such factors also will affect the types of services and work supports that may be needed to help people meet work requirements and gain employment. The availability of safe and affordable housing can affect whether residents who increase their wages can become self-sufficient and move off assisted housing. Such studies can provide insight into the conditions most conducive for successful outcomes and how work-related services and contextual factors can intersect positively.

Research on these questions will require gathering additional data from the housing agencies, HUD, and other sources, including collecting qualitative data from tenants. Analysis can help build evidence

on the implementation of work requirements and associated outcomes across agencies. Analysis also would support comparisons across agencies to assess whether and how a range of resident and agency outcomes vary by policy design and implementation practice, which in turn may suggest best practices for work requirements. Ultimately, the question of whether work requirements make a significant difference in tenants' lives requires a study of policy impact that compares employment and income outcomes for housing-assisted families subject to work requirements with assisted households not subject to such requirements.

Appendix A. Overview of the Nine MTW Public Housing Authorities with Work Requirements

This appendix provides additional information on the work requirement policies drawn from agencies' annual MTW reports and MTW plans and HUD public housing authority profiles.

Atlanta, GA

The Atlanta Housing Authority (AHA) joined the MTW demonstration in 2001 and implemented work requirements in 2005. AHA manages approximately 8,200 public housing units and 18,800 vouchers. AHA's work requirement targets public housing residents, specifically nondisabled adult household members between ages 18 and 61. The policy requires target residents to maintain continuous employment of at least 30 hours a week and all other nonelderly, nondisabled adults in a household to maintain 30 hours of work or participation in a combination of school, job training, or part-time employment as a condition for receiving and maintaining housing assistance.

Champaign County, IL

The Housing Authority of Champaign County (HACC) joined the MTW demonstration in 2010 and implemented work requirements in 2013. HACC administers approximately 447 public housing units and 1,706 vouchers. HACC's local self-sufficiency program mandates that public housing residents ages 18 through 54 are employed 20 hours or more a week for a minimum of 12 months. HACC offers tenant services such as job skills training, in-home education programs, and youth programs.

Charlotte, NC

The Charlotte Housing Authority (CHA) joined the MTW demonstration in 1999 and implemented work requirements in 2013. CHA manages approximately 4,900 public housing units and 4,500 vouchers. The work requirement began as a demonstration in 5 of CHA's 15 developments before being rolled out to 14. CHA phases its work requirement. The first phase mandates that a head of household in public housing works 15 hours a week and that all other adults in the household work at least 5 hours a week, increasing the overall hour requirement for the household (i.e., the requirement for a household with three adults would be $15+5+5=25$ hours a week). In the final phase, the weekly work requirement

for the head of household increases to at least 30 hours and for other adults to 10 hours (i.e., $30+10+10=50$ hours a week for a household with three adults).

Chicago, IL

The Chicago Housing Authority (CHA) joined MTW in 2000 and implemented work requirements in 2009. CHA manages approximately 26,300 public housing units and 49,800 vouchers. Its work requirements target all adult members of public housing households ages 18 to 54 (and 17-year-old members who are not attending school full time). CHA also is piloting work requirements with 100 vouchers. Residents are required to engage in employment or employment-related activities for a minimum of 20 hours a week unless they are eligible for an exemption or granted “safe harbor.” Safe harbor prevents eviction proceedings for residents who are unable to comply with the work requirement for certain reasons, including reasonable accommodation, temporary medical conditions, recent employment separation, and other circumstances that present barriers to finding or maintaining employment. CHA offers case management services and workforce development programs to help people meet the requirement.

Delaware

The Delaware State Housing Authority (DSHA) joined MTW in 1999 and implemented work requirements paired with time limits in two phases; Tier I in 2000, and Tier II in 2013. DSHA administers approximately 500 public housing units and 600 vouchers. DSHA’s Tier I work requirement mandates that public housing residents are employed at least 20 hours a week earning no less than minimum wage or are in a training or educational program for at least 20 hours a week. Tier I participants can begin school, education, or training within the first three years of tenancy and have the time counted toward hourly work compliance. Residents not working full time after three years must comply with Tier II requirements and work at least 30 hours a week; training or educational activities are not counted. DSHA limits housing assistance to seven years for all residents.

Lawrence-Douglas County, KS

The Lawrence-Douglas County Housing Authority (LDCHA) joined MTW in 1999 and implemented work requirements the same year. LDCHA’s portfolio includes 400 public housing units and 600 vouchers. LDCHA mandates that all adult residents work at least 15 hours a week or participate in the agency’s Family Self-Sufficiency Service Works Program for 15 hours a week. In two-adult households with minor children, the work requirement can be met if one adult works 35 hours a week. Tenants already working, going to school (in high school, a GED class, vocational school, or college), or enrolled in a job-training program meet the work requirement. LDCHA offers employment services to residents to support the work mandate.

Lexington, KY

The Lexington Housing Authority (LHA) joined MTW in 2011 and implemented work requirements in 2014. LHA's portfolio includes 1,303 public housing units and 2,512 vouchers. LHA enforces work requirements for its scattered-site, public housing self-sufficiency units located across the city. The work requirement mandates that the head of household or spouse works at least 37.5 hours a week (Self-Sufficiency I) or 20 hours (Self-Sufficiency II). A single head of household enrolled as a full-time student in an accredited college, university, or vocational school also meets the Self Sufficiency II requirements. LHA partners with social service providers to provide supportive services to residents in the self-sufficiency units.

Louisville, KY

The Louisville Metro Housing Authority (LMHA) joined MTW in 1999. It manages 5,300 public housing units and 9,500 vouchers. LMHA implemented work requirements in 2007 for public housing and voucher tenants of the Clarksdale HOPE VI replacement scattered-site development. LMHA work requirements are paired with a five-year term limit, and all residents in the eligible units receive case management services. Adult household members must be full-time students or be employed and working at least 20 hours a week for at least the minimum wage unless they are elderly or disabled. In its 2016 MTW annual report, LMHA proposed removing the five-year term limit and mandatory case management requirement for scattered site, single-family, detached houses. Families currently using case management services will be able to continue receiving services if they choose, but no new families will be enrolled in case management. The Family Self-Sufficiency Program will remain open to families currently residing in these units and to any new families that move into these units.

San Bernardino County, CA

The Housing Authority of the County of San Bernardino (HACSB) joined MTW in 2008. It manages 1,700 public housing units and 8,400 vouchers. HACSB began piloting work requirements at its Maplewood Homes public housing community in 2010. All adult nonelderly and nondisabled household members at Maplewood Homes were required to engage in work-related activities for at least 15 hours a week. Work-related activities were defined as those that remove barriers to gainful employment, lead to gainful employment, or were employment. The pilot offered assistance with child care costs. The Maplewood Homes community was converted under the Rental Assistance Demonstration program in fiscal year 2016. Under the Rental Assistance Demonstration program, HACSB is unable to mandate participation in work-related activities. It ended the work requirement at Maplewood Homes in fiscal year 2016. The agency continues to require voucher holders who port into the county to meet its work requirement.

Appendix B. Method for Identifying Work Requirement Activities

To identify work requirement activities implemented by MTW agencies, we received permission to use a Microsoft Access database the Urban Institute created for its Moving to Work evaluation (Cooperative Agreement H-21667CA). The database is populated with information from the publicly available MTW agency plans. It includes the following information for each activity included in agencies' fiscal year 2015 plans:

- Activity name, number, status (not yet implemented, ongoing, on hold, closed out)
- Years proposed, implemented, put on hold, closed
- Authorization(s)
- Activity description
- Statutory objective(s) cited (cost effectiveness; self-sufficiency; housing choice)

For this brief, we conducted a database query to identify “occupancy policy” activities. We restricted the activities to those referencing mandatory work requirements. Because MTW-required documentation does not specify how to classify work mandates, we might have missed relevant activities that an agency classified in a way not recognized by our query.

Notes

1. Tracy Jan, “Trump Wants More People Who Receive Housing Subsidies to Work,” *Washington Post*, May 23, 2017, https://www.washingtonpost.com/news/work/wp/2017/05/23/for-the-first-time-poor-people-receiving-housing-subsidies-may-be-required-to-work/?utm_term=.7f7074d7b2bf. For more about housing assistance programs, see Scally et al. (2018).
2. MTW agencies have three statutory objectives: (1) to reduce housing agency costs and achieve greater cost effectiveness, (2) to help households obtain employment and become economically self-sufficient, and (3) to increase housing choices for low-income households. See “Moving to Work – Public and Indian Housing,” US Department of Housing and Urban Development, accessed January 10, 2018, https://www.hud.gov/program_offices/public_indian_housing/programs/ph/mtw.
3. HUD plans to expand MTW to 100 public housing agencies, with the first cohort of agencies to be designated in 2018 and subsequent cohorts added through 2020. Each cohort of agencies will be required to implement a specific policy change, one of which will be work requirements. HUD intends to rigorously evaluate the policy changes. See “Moving to Work Expansion,” US Department of Housing and Urban Development, accessed January 10, 2018, https://www.hud.gov/program_offices/public_indian_housing/programs/ph/mtw/expansion.
4. A national survey of public housing agencies administered from December 2013 to January 2014 found variation in whether and how agencies verified households' disability claims (Scally, Brucker, and Arigood-Obycki, n.d.).
5. This method is similar to one the Center on Budget and Policy Priorities used to estimate that 6 percent of the adults that receive housing assistance (or about 261,000 people) would be affected by work requirements if a policy were applied nationally (Fischer 2016). This estimate is limited in at least a few ways: some portion of households reporting TANF receipt likely are subject to TANF work requirements and might already meet a

public housing agency's requirements; households reporting wages as a major source of income might not be working enough hours to meet an agency's requirements and would be subject to them; and households reporting other sources of income might include nonelderly, nondisabled household heads and therefore be subject to an agency's requirements.

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