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Constraints and opportunities for innovation in the Moving to Work Demonstration Program

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ABSTRACT

The Moving to Work (MTW) Demonstration Program provides participating housing agencies with additional programmatic and operational flexibility that is used to achieve Congress's statutory goals. The MTW Demonstration Program is designed to provide agencies with the flexibility to pursue innovative activities, yet there are myriad constraints that alter the behavior of these agencies. This study uses evidence generated from interviews with personnel from MTW agencies to understand how they use MTW to address and overcome bureaucratic, resource, and market constraints to further their mission. The findings from this study enhance our understanding of MTW agencies, their decision-making, and how they innovate in a constrained environment. These results are relevant to a wide audience, including existing MTW agencies, public housing authorities that are considering MTW designation under the new expansion, housing researchers, as well as policymakers and practitioners who focus on federal housing policy and innovation in public agencies.

The Moving to Work (MTW) Demonstration Program, established by Congress in 1996, provides participating housing agencies¹ with additional programmatic and operational flexibility that can be used to achieve three statutory goals: reduce costs while increasing efficiency in the delivery of housing services, enhance residential choice, and achieve greater self-sufficiency² for residents. MTW status is an essential element of the agency's operation that supports a culture of innovation and prompts organizations to alter and test policy and programs (Khadduri et al., 2014; Webb, Frescoln, & Rohe, 2017). The MTW Demonstration Program is designed to provide agencies with the flexibility to pursue innovative activities, yet there are myriad constraints that these agencies encounter. MTW agencies have greater freedom and latitude than non-MTW agencies, but their day-to-day activities are still governed by a range of constraints that shape the way they plan, innovate, and operate in both the short- and long-run.

In 2018, the U.S. Department of Housing and Urban Development (HUD) executed new agreements with the existing 39 MTW agencies for an additional ten years. Furthermore, in 2016 Congress expanded the scope of MTW to include an additional 100 public housing authorities (PHAs). As a result, existing MTW agencies are now determining how to further the mission of their organization, and new MTW agencies will be determining how to innovate under the flexibility provided by MTW status. The continuation and expansion of the MTW Demonstration Program motivates the need to understand the environment in which MTW agencies operate to enhance the potential of innovation in housing policy.

Compared to other programs such as HOPE VI and Moving to Opportunity, MTW has received relatively little scholarly attention (Webb, Frescoln, & Rohe, 2016). The specific activities in which MTW agencies are involved are well-documented (e.g., Abravanel et al., 2004; Cadik & Nogie, 2010; Webb, Frescoln, & Rohe, 2015), but the constraints in which MTW agencies operate, and how they respond, has not been explored or captured in the literature. Therefore, the focus of this study is not on the activities of these agencies, but rather on the key constraints that influence innovation and organizational strategies and responses considering the constraints.

To better understand the operational model and culture of innovation, this study investigates how housing agencies use MTW, the opportunities it presents, the constraints that limit the effectiveness of MTW initiatives and activities, and how MTW agencies are innovating in the face of these constraints. The two research questions

addressed are: 1) What are the primary constraints that housing agencies confront as they seek to fulfill the goals of MTW? and 2) How are MTW agencies responding to these constraints? The findings from this study enhance our understanding of MTW agencies, their decision-making, and how they innovate in a constrained environment. These results are relevant to a wide audience, including existing MTW agencies, PHAs that are considering MTW designation under the new expansion, and housing researchers, as well as policymakers and practitioners who focus on federal housing policy and innovation in public agencies.

In this paper, we provide an overview of federal housing policy in the U.S., the history of the MTW Demonstration Program, and a summary of literature on housing and public agency innovation. Next, we introduce the methods used in this study that primarily consist of semi-structured interviews with MTW agencies that are supplemented by document review. We then present the findings of this study, which are grouped by bureaucratic, resource, and market constraints and responses. Finally, we conclude with a discussion on the relevance of the research for existing MTW agencies, PHAs that are new to the demonstration program, and policymakers who have oversight responsibility for MTW.

Policy context

The trajectory of federal housing policy in the U.S. provides important background and context for understanding MTW designation and its goals and objectives. The onset of the Great Depression was a catalyst for a more change in housing policy was a shift away from supply-side federal production programs (public housing) in favor of demand side programs such as housing vouchers (Kleit & Page, 2008). In 1974, the Section 8 Housing Allowance Program (now known as the Housing Choice Voucher Program or HCV Program) was established. Furthermore, a decade later, the Low-Income Housing Tax Credit was created to alter the role of the federal government in the provision of housing to low-income households in the hopes of reducing the cost of housing for eligible households (Brick & McCarty, 2012). The government's role as landlord was de-emphasized in favor of a system in which the government provides subsidies and the private market becomes the dominant delivery mechanism for housing services.

Federal programs for low-income housing are administered locally through a system of housing authorities that are locally chartered. PHAs manage public housing stocks and administer federal housing programs such as Public Housing and Housing Choice Vouchers. PHAs may also manage other types of housing programs that are not federally funded, or provide services based on local needs such as employment training or home-ownership programs. HUD establishes procedures, standards, and requirements for agencies that administer federal programs and oversees and monitors these activities to ensure compliance with all regulations. This oversight covers financial management and compliance with fair housing regulations.

The changes in housing policy that began in the 1970s created significant challenges for local PHAs. As federal decision-making devolved to the local level, PHAs were provided greater flexibility and increased responsibility, while receiving less financial support from the federal government (Kleit & Page, 2015). This devolution, combined with an increased emphasis on market-based housing provision using vouchers and tax credits, produced a complex arrangement in which housing for low-income households became a hybrid endeavor with participation from the public, private for-profit, and nonprofit sectors (Nguyen, Rohe, & Cowan, 2012).

By the mid-1990s, the remaining stock of public housing units began to transition from

providing permanent housing for low-income households to promoting self-sufficiency and encouraging tenants to transition out of public housing to private market housing with the help of government support (Rohe & Kleit, 1997). Examples of such programs include Family Self-Sufficiency (FSS), Operation Bootstrap, HOPE VI, Moving to Opportunity, Jobs-Plus, and the Gateway Transitional Families Program (Kleit & Rohe, 2005; Webb et al., 2016). At the same time, broader policy goals of ending dependence on public assistance were codified in the Personal Responsibility and Work Opportunity Act of 1996. This legislation, commonly referred to as welfare reform, brought additional focus on dependency and self-sufficiency (Brick & McCarty, 2012). The work requirements of welfare reform changed the nature of public assistance in the U.S. and had a significant impact on public housing programs because of the overlap in program participants (Abravanel et al., 2004). Two years after welfare reform, the Quality Housing and Work Responsibility Act (QHWRA) of 1998 was passed. QHWRA supported the work of public housing residents, mandated community service, encouraged participation in self-sufficiency programs, introduced mixed finance projects, and changed rent policies to encourage work (Devine, Rubin, & Gray, 1999; Rohe, Webb, & Frescoln, 2016; Sard & Lubell, 2000).

While work requirements were being added to a range of public assistance programs, Moving to Work (MTW) was initiated by Congress as a demonstration program through Section 204 of the Omnibus Consolidated Reversions and Appropriations Act of 1996. MTW provided a small number of designated housing agencies that applied through a competitive process with the flexibility to test innovations and experiment with policies, procedures, and activities that encouraged self-sufficiency. MTW status provides the ability to design and test innovation in the delivery of housing and housing assistance. The hope was that local innovation and success could subsequently be implemented at a national scale. MTW was designed to address criticisms about dependency and poverty traps (Nguyen et al., 2012), but housing advocates fought to provide local PHAs with management flexibility and operational control in the MTW legislation. The ultimate demonstration program reflected a compromise between those arguing for devolution and decentralization with respect to management and operations and those wanting to prevent devolution and decentralization with a focus on enhanced goals for self-sufficiency (Abravanel et al., 2004). The statutory goals of MTW reflect this compromise.

The MTW Demonstration Program

The MTW Demonstration Program was established with three primary goals (Omnibus Consolidated Reversions and Appropriations Act of 1996, Public Law No. 104-134 § 204). First, MTW was designed to increase the efficiency with which agencies provide housing by leveraging funds and streamlining processes. Activities designed by MTW agencies to achieve this goal include reduced frequency of income recertifications and inspections, changes to rent policies, changes in waitlist practices, administrative efficiencies, and simplified income calculations (Webb et al., 2015). Second, MTW sought to enhance housing choices for low-income households. To fulfill this goal, MTW agencies sought to promote mixed-income and public-private developments, develop sponsor-based voucher programs to assist at-risk groups, and encourage moves to opportunity areas. Activities that helped to achieve this goal include issuing sponsor-based vouchers managed by local service agencies, providing supportive housing options, collaborating with private developers to construct affordable housing, adopting sub-market payment standards to provide access to opportunity neighborhoods, and creating subsidiary agencies or nonprofit arms to develop affordable housing (Galvez, Simington, & Treskon, 2016;

Webb et al., 2015). Finally, the third goal of MTW was to assist households to achieve self-sufficiency. Activities designed by MTW agencies to address this goal include establishing work requirements for work-able residents, imposing time restrictions on housing assistance, emphasizing self-sufficiency programming, and partnering with community partners to promote education and health (Webb et al., 2015). Many of the activities that were started under MTW address more than one of the statutory goals of the demonstration program.

The primary mechanisms that MTW agencies use to achieve the three statutory goals highlighted above are budget flexibility and waivers from standard federal regulations (Omnibus Consolidated Rescissions and Appropriations Act of 1996, Public Law No. 104–134 § 204). MTW agencies are given “single-fund budget flexibility” which means they can combine funding streams from the federal government into a single account. This flexibility is not provided to other housing agencies that do not have MTW status. While MTW agencies do not receive additional funds because of MTW status,³ they are able to combine funds designated for public housing operating, public housing capital (modernization), and Housing Choice Voucher funds. MTW agencies can allocate these funds to activities based on the priorities of a particular agency. MTW agencies are also able to request waivers or apply for exemptions from standard federal regulations that apply to Public Housing (Section 9) and the Housing Choice Voucher program (Section 8) to pursue innovative ideas that could, if successful, be considered for national adoption. Examples of these waivers or exemptions include reducing the frequency of Housing Quality Standard inspections for compliant landlords of units occupied by voucher holders or reducing the frequency of income re-certifications for voucher recipients. This flexibility allows MTW agencies to respond to critical local needs, create local partnerships to enhance services, and make programmatic changes that promote self-sufficiency (Nguyen et al., 2012).

While MTW status provides significant flexibility, participating agencies must serve the same number of households as they would without MTW, at least 75% of households served must be very low-income,⁴ maintain HUD housing quality standards, obtain public input and comments on MTW plan and policies, establish rent policies that encourage employment and self-sufficiency, and collect and report data on activities (Omnibus Consolidated Rescissions and Appropriations Act of 1996, Public Law No. 104–134 § 204). Given the flexibility and ongoing constraints associated with participation in MTW, Cadik and Nogic (2010) highlight the attributes that allow MTW agencies to implement creative and robust activities under MTW: they are high performers, have strong evaluation capacity, have demonstrated the ability to innovate, have the support of residents and the community, articulate how MTW can be used to address community needs, and they have strong leadership and staff that are committed to innovation and change.

The MTW Demonstration Program was initiated in 1996 to allow up to 30 PHAs to test innovative activities that could be implemented throughout the country. Initially, 24 agencies applied and received the MTW designation. That number fell to 18 by 2000 after six agencies dropped out of the demonstration program; refer to Webb et al. (2015) for a full description of MTW entry and exit. Over the years, additional PHAs have become MTW agencies and by 2013, there were 39 housing agencies with the designation (Webb et al., 2015). In 2018, these agencies extended their Standard MTW Agreements for an additional ten years through fiscal year 2028. The 2016 MTW Expansion Statute authorized HUD to expand the MTW Demonstration Program to an additional 100 PHAs over a period of seven years (Operations Notice for the Expansion of Moving to Work Demonstration Program, 2018). The purpose of the expansion is to learn from new interventions to

improve the delivery of assisted housing and to promote self-sufficiency. At least half of the new agencies will be small PHAs, administering fewer than 1,000 vouchers and public housing units (Operations Notice for the Expansion of the Moving to Work Demonstration Program, 2018).

MTW is a complex program with varied results. MTW was originally structured as a demonstration program and was not intended to be permanent. As a result, participating agencies have not operated with the confidence that a permanent program would provide. The temporary nature of the program caused some agencies to only make changes that impact a part of their operations or small number of households (Abravanel et al., 2004). Proponents of MTW argue that, despite these challenges, the flexibility allowed by the demonstration program has led to advancements positive outcomes in both public housing and the Housing Choice Voucher program. For example, Buron et al. (2017) found evidence of positive outcomes of MTW including higher earnings of households, fewer public housing units with unmet capital needs, and higher inspection scores of public housing units. Despite these findings, support for MTW is not uniform. Opponents of MTW argue that it should not be expanded based on evidence pointing to disappointing program results (e.g., Fischer, 2010; Fisher, 2011; Fischer, 2017b). Webb et al. (2016) discuss the policy critiques of MTW and organize the criticisms into three categories: “(1) lack of sufficient federal oversight, (2) failure to evaluate implemented activities, and (3) increased conditionality of housing assistance” (p. 118–120). This complex policy context serves as the backdrop and motivation for this study. By understanding the operational model and culture of innovation, this study highlights both the opportunity MTW presents as well as the constraints that limit the effectiveness of MTW initiatives and activities. For example, critics argue that MTW shifts housing agencies into the role of housing developer and provider of services beyond their mission of housing low-income populations (Webb et al., 2016). Delving into the bureaucratic, resource, and market constraints, provides a backdrop for understanding the evolving role of these agencies and why they may be participating in activities that were traditionally held by the private sector or other nonprofit agencies.

Innovation in housing and public agencies

Although the constraints and opportunities for innovation in the MTW Demonstration Program have not been previously explored in the literature, there is a body of work that addresses how housing agencies have innovated and adapted to changing environments and conditions over time. Furthermore, extant research has explored innovation in the public sector and policymaking, which provides context when considering the constrained environment housing agencies must operate and innovate in.

The common theme in the body of work on adaptation and innovation in housing agencies is responding to neoliberal policies and the devolution of federal housing policy in the United States. Federal funding cuts and increased responsibility at the local level led to a series of responses by housing agencies to address the need for affordable housing in their local communities. Basolo and Scally (2008) focus on this gap at the state level and identify both external factors (perception of crisis, interest group activity, local autonomy, and political context) and internal factors (resources and institutional structure) that are associated with innovation in affordable housing policy. The literature on the local level highlights the hybrid model housing authorities have adopted as social enterprise and private market actors (Kleit, Airgood-Obrycki, & Yerena, 2019; Kleit & Page, 2008, 2015; Nguyen et al., 2012). To continue their public mission, housing agencies have engaged in private market development activities, diversified funding streams, leveraged limited resources through partnerships with social service providers, and have created nonprofit subsidiaries (Kleit et

al., 2019; Kleit & Page, 2008, 2015; Nguyen et al., 2012).

Extant research highlights drivers that either promote or inhibit innovation. De Vries, Bekkers, and Tummers (2015) provide a heuristic framework of public sector innovation that is organized by environmental (external factors such as the regulatory environment), organizational (structural and cultural features of the organization), innovation characteristics (attributes of the innovation such as ease or complexity of it), and individual antecedents (characteristics of those innovating). This framework highlights many of the complexities associated with innovation in public sector organizations. Several of these drivers that pertain to the MTW Demonstration Program are featured.

Regulation (Johns, O'Reilly, & Inwood, 2006), governmental fragmentation (Deslatte, Feiock, & Wassel, 2017), institutional constraints (Galston & McElvein, 2015), and the administrative culture (Borins, 2001) are particularly relevant for MTW agencies. At a higher level of abstraction, the MTW Demonstration Program is a case of innovation in a constrained environment. At the center of this study is a conspicuous dichotomy: on one hand, MTW serves as a center of innovation for federal housing policy in the U.S., while on the other hand, PHAs operate within a federal bureaucracy that controls many of the activities that they pursue. Therefore, PHAs do not represent innovation laboratories with unfettered flexibility and freedom. For example, if a local housing need arises, a PHA cannot immediately direct funds to this emerging need. Rather, the PHA must either create a new activity or modify existing activities and procedures in their annual plan and submit it to HUD for review and approval. Galston and McElvein (2015) analysis of public-sector innovation helps to explain the complexity associated with institutional innovation: "one fact remains immutable: the default setting of every form of government... is the status quo" (p. 20). In addition, Galston and McElvein (2015) also find that public sector innovation is far easier when an organization is new. Institutional legacy along with a risk-adverse culture makes innovation more challenging. These factors help to inform the analysis of innovation for MTW agencies.

Study design and methods

The data and evidence used in this study were generated from semi-structured interviews with MTW agencies supplemented by document review. Two MTW agencies helped with recruitment and encouraged other agencies to participate. At the time of the study, none of the 2016 MTW expansion agencies were selected so they are not included in this study. We invited all 39 existing MTW agencies as of 2018 to participate through an initial and follow-up e-mail invitation. Twenty-one MTW agencies (54 percent) agreed to participate in the study. The 21 interviews were conducted by telephone between July 24 and 5 September 2018. The sample of agencies include various sizes of PHAs, although many of them are large PHAs since the designated MTW agencies tend to be larger. Together, the MTW agencies that were interviewed manage over 67,000 public housing units and administer more than 221,000 vouchers. The agencies are primarily located in urban areas. Thirteen different states were

represented and each region of the country (Northeast, South, Midwest, and West) was included although most participating agencies are in the Western region of the United States. Table 1 provides additional details about the sample of MTW agencies. The average PHA interview lasted 72 minutes with a total of 25 hours of cumulative interview time. On average, between two and three staff members participated in the interviews from each agency, and in total, we spoke to 53 different MTW agency officials. A wide variety of functional roles were represented in the interviews including staff with the following job

titles: executive staff (executive directors, deputy directors, and chief operating officers), department directors, and various staff dedicated to MTW activities such as MTW coordinators as well as policy and research staff.

Table 1. Descriptive characteristics of MTW agencies.

MTW Agency Characteristics	Participated in Study	Did Not Participate in Study	Total MTW Agencies
<i>Region</i>			
Northeast	3	6	9
South	2	5	7
Midwest	3	5	8
West	13	2	15
<i>Size (combined vouchers and public housing units)</i>			
Less than 5,000	6	8	14
Between 5,000–15,000	8	6	14
Greater than 15,000	7	4	11
<i>Duration of MTW Status</i>			
Original MTW agency	11	5	16
Added at a later date	10	13	23

The interview protocol was developed after reviewing three categories of documents: 1) relevant academic literature, 2) MTW background and evaluation documents, and 3) PHA documentation such as supplemental information from agency websites, MTW agreements with HUD, and annual plans and reports. The literature and document review identified areas where knowledge needed to be generated. In addition, several PHAs provided feedback on the interview protocol, with significant contributions from the same PHAs involved with recruitment. The semi-structured interviews invited agency officials to share their thoughts and ideas on a range of current challenges and constraints around strategic planning, streamlining activities, balancing goals between intensity of service delivery and increasing the number of households served, and metrics and reporting. In response to confidentiality concerns by interviewees, none of the interviews were recorded. At least two members of the research team participated in each call: one person conducted the interview and took general notes, while the second person took detailed notes and asked follow-up, clarifying questions as needed. The two sets of notes were reviewed for internal consistency and to verify the accuracy of the information.

Analysis followed a general inductive approach used in qualitative evaluation research (Thomas, 2006). Once the interview notes were complete, multiple members of the research team reviewed the interviews to identify key themes that emerged throughout the course of the interviews. Using independent parallel coding, the complete set of interview notes were divided among four members of the research team, with notes from each interview reviewed by two researchers. Each researcher identified key categories and themes within the data. A series of coding meetings with the research team helped establish internal consistency for the most common and relevant themes. The content of the findings was organized by constraints in the MTW environment and responses to these constraints that were consistently mentioned (by more than two agencies) in three clusters: bureaucratic constraints, resources constraints, and market constraints. Emerging findings have also been shared with participating MTW agencies, offering the opportunity for stakeholder checks and corrections.

Research findings

The findings of this study are presented in two distinct categories. First, the various

constraints associated with innovation at MTW agencies was a dominant theme in our interviews. Second, interviewees provided detail on the innovations that they have pursued despite, and in response to, the conspicuous constraints. As mentioned in the introduction, the activities that MTW agencies are involved are well-documented in the literature (e.g., Abravanel et al., 2004; Cadik & Nogie, 2010; Webb et al., 2015). Therefore, the focus of this study is not on the activities of these agencies, but rather on the key constraints that influence innovation, and organizational strategies and responses considering the constraints.

Constraints in the MTW environment

In our interviews with personnel from MTW agencies, numerous constraints were identified that can help explain the context in which MTW agencies operate. The constraints broadly fell into three discrete categories: bureaucratic constraints, resource constraints, and market constraints. Each category of constraints influences the behavior of MTW agencies in meaningful ways.

Bureaucratic constraints

The first category of constraints is institutional in nature and stems from the fact that HUD oversees MTW and therefore has responsibility for these agencies and exerts considerable control over them. The bureaucratic constraints that we identified in this study are: a) timing/uncertainty, b) limited scope, c) HUD review of new activities, and d) HUD-mandated reporting requirements. First, MTW agency officials repeatedly highlighted the fact that MTW is only a demonstration that is not permanent and has an uncertain future. Because MTW must be re-authorized and new MTW agreements take substantial time to renegotiate, MTW agencies are reluctant to pursue innovations that might outlive the term of the MTW Demonstration Program. Instead, agencies innovate within the bounds of the next extension (currently 2028). Within the ten-year extension window, authorities spend the first couple of years proposing and creating new innovations and initiatives, the next few years are spent implementing these innovations, and in the last few years they are focused on potential changes based on the uncertainty associated with the future of the MTW designation. A common desire among respondents was to “make MTW permanent” to eliminate the uncertainty associated with the demonstration program and the time and resources spent on renegotiating MTW agreements. Agency officials believe that creating a permanent program would support greater innovation with a longer time horizon.

In addition, because annual allocations from the federal government vary on a year-to-year basis, it is difficult to make long-term plans when an agency can only make fiscal projections a year at a time. Multiple agency officials echoed the sentiment expressed by one interviewee that said it is “impossible” to meet the goals of the strategic plan when one does not know what the annual budget is going to be. Furthermore, key political elections create substantial uncertainty given the potential funding consequences of different political outcomes.

The second bureaucratic constraint is that MTW designation only applies to Section 8 (Housing Choice Voucher program) and Section 9 (public housing capital and operating funds). PHAs cannot waive any requirements under the National Environmental Policy Act, Fair Housing Act, Civil Rights Act of 1964, Americans with Disabilities Act, and the Age Discrimination Act of 1975 (Operations Notice for the Expansion of the Moving to Work

Demonstration Program, 2018). The authors of this paper and MTW agency officials are not suggesting that MTW agencies be exempt for these acts and laws; rather, the limited scope of MTW is important to understand when considering innovation. For example, there are many activities within the purview of an MTW agency that cannot be changed because they do not have the authority to do so. For example, federal law has established community service requirements for program participants, procurement rules, and environmental reviews for property acquisition that cannot be changed.

The third bureaucratic constraint is the review and oversight requirements imposed by HUD. The process of getting new activities approved by HUD has a material impact on MTW innovation. HUD requires extensive details about a new activity, including expected outcomes, which discourages experimentation, thereby undermining innovation. Because the approval process is robust and requires extensive documentation, the burden on MTW agencies is high and the review process is slow. Calling MTW “a gift,” one interviewee asserted that HUD does not like MTW and looks for ways to “create a new box” for regulating the demonstration program. In addition, the HUD approval process emphasizes program success, and therefore agency officials are reluctant to propose untested or uncertain ideas. One agency official noted that there seems to be an emphasis on only implementing successful activities but that is not how innovation works. This approval process can make it difficult for MTW agencies to respond when market or other external factors change.

Finally, MTW agencies experience with HUD’s requirements for tracking metrics is a bureaucratic constraint. Since “institutions typically define the locus of responsibility and accountability” (Galston, p. 3), bureaucratic oversight from HUD is expected. Problems arise, however, because of the inconsistency of oversight and the lack of alignment between reporting requirements and program activities. One respondent expressed frustration about ever-changing HUD rules that substantially hinder the efficacy of MTW agencies. In the early years of the MTW Demonstration Program, HUD did not enforce strict reporting requirements for MTW agencies (GAO, 2012; 2013). Later, in response to concerns raised in U.S. Government Accountability Office reports, HUD began to enforce the reporting requirements more intensely. To facilitate reporting, HUD developed a comprehensive set of reporting requirements for the agencies’ annual reports. These changes burden participating agencies; for example, one interviewee noted that the annual reports require “everything you attempted or thought you would attempt since day one”. In addition to consuming a lot of agency time, many of the metrics do not capture outcomes that are the focus of MTW agencies. One agency official highlighted that they have many activities that are very useful to the community but are not captured in any meaningful way in the HUD metrics. In almost every interview, it was mentioned that centralized reporting requirements do not work well in a federal system in which local agencies are creating new activities that differ across locations. Therefore, respondents strongly emphasized that the oversight, comparability, and reporting standards for MTW agencies fail to measure or capture the entire impact of innovative activities.

Resource constraints

A second category of constraints deal with the resources that MTW agencies have at their disposal. The presence, or absence, of certain resources can either stimulate or stifle innovation. Within this category, numerous constraints emerged in our interviews: a) human resources, b) limited funding for development and implementation, c) software, and d) opportunity costs. The inability to address these resource needs may prevent an agency

from pursuing innovative activities that could improve the outcomes of households that it serves.

First, there are significant human resource constraints that impede the innovative efforts of MTW agencies. Interview responses and previous research (e.g., Cadik & Nagic, 2010; Khadduri et al., 2014) note the significant impact of strong leadership on innovative activities. A common theme in our interviews was the importance of leadership in promoting and implementing innovations. Many MTW agencies have executive directors who are forward thinking, push new ideas, and view MTW as an organizational philosophy or “creative force” within the institution. In addition, many of the MTW activities require sophisticated skills that are typically found among researchers (program design, monitoring, data analysis, and program evaluation). No funds are set aside to support research at MTW agencies, therefore a key constraint on innovation is the presence of research skills within an MTW agency. Last, MTW agencies are constantly testing effective ways to use regulatory flexibility, which requires a lot of time and resources. As a result, the availability of human resources to implement and review new activities is essential for productive innovation at an MTW agency. Human resources are also required when new innovations are implemented throughout the agency. The success of a new activity is dependent upon the ability of staff throughout the organization to implement it. Resource constraints that limit the ability to train staff stifle the effectiveness of innovative approaches. Second, despite the importance of the MTW Demonstration Program, no additional funds are provided to participating agencies to test innovative ideas. Therefore, MTW provides flexibility to pursue new activities without providing additional funding to support those efforts. This theme emerged frequently in discussions with MTW agencies. Staff reported several new activities that were explored but never implemented because these activities would have increased the cost spent on each household, and if pursued, would result in fewer households being served. Such an approach is not an option because serving fewer households is not allowed under the demonstration program.

Third, software and IT systems emerged as a significant innovation constraint among MTW agencies. New activities that change the way that an agency works requires corresponding changes to software and reporting systems. One interviewee advised new MTW agencies to move slowly because of information technology implications. This respondent urged new MTW agencies to be cautious about software changes, because “if you change it, then you have to pay for it again.” Therefore, the inability to restructure IT systems to accommodate new programming is a significant resource constraint for MTW agencies. Where IT and software development skills are absent, or are in short supply, MTW agencies struggle to implement large-scale organizational changes.

Last, because the funds provided to PHAs are limited, each programming decision is zero-sum from a financial perspective – an increase in funding for one initiative requires an equivalent reduction in funding for a different activity. One agency official mentioned, “every time you move forward with an activity that will help a certain group of households, you are also effectively saying no to another group in need.” This balancing act repeatedly emerged in interviews with MTW agency officials who expressed how difficult it is to make these decisions. Due to the opportunity cost associated with these resource allocation decisions, innovative ideas that require additional or the reallocation of funding could be stifled or not pursued at all.

Market constraints

The final category of constraints is market-based. Each MTW agency operates in a unique setting with diverse market conditions, community preferences, policies, and

priorities. These market factors exert influence on the operations of an MTW agency, and therefore influences the innovation that an agency can or should pursue. The first market constraint is local market and political conditions. For example, markets with rapidly increasing housing costs pose significant challenges for MTW agencies. This external constraint complicates efforts to effectively serve households that receive housing support. Interviewees expressed that “the voucher program is not working in high cost markets” and this was cited as one of the main challenges that MTW agencies face.⁵ Furthermore, interviewees highlighted that as the affordable housing crisis worsens in high-cost markets, federal funding continues to be cut, homelessness is increasing, construction costs continue to rise, contractors are not bidding on projects because they are too busy, and high labor costs have led to the inability to hire qualified staff at PHAs. In addition, local politics and preferences can influence the direction and focus of agency efforts. For example, when high profile issues like homelessness and housing affordability receive extensive attention from the public, MTW agencies feel pressure to address these issues in their innovative activities.

Another local market constraint that emerged is attributed to housing agencies located in metropolitan areas that have a large and aging public housing stock. PHAs experienced a loss of federal operating and capital funds for public housing in the early 2000s. Kleit and Page (2015) note that the annual operating funds were decreased from 98 percent to 75 percent of the funding formula while experiencing a decline in capital funds. As a direct result, interviewees stated that they struggle to maintain their properties with capital funds and have received tremendous pressure from the community concerning their dilapidated public housing stock. On the other hand, they also receive criticism from the community when they demolish public housing and redevelop it to be less dependent on federal subsidies.

To complicate matters, multiple agency officials noted the importance of keeping residents and community members informed about any potential changes. Failure to do so could jeopardize the success of a particular initiative. Because current conditions inform the opinions of agency officials, MTW agencies must ensure that their efforts are consistent with community opinion and local market realities. One interviewee discussed holding public forums to hear about the community’s priorities. All these factors can constrain the innovative efforts of MTW agencies. In sum, agency officials reported a significant sense of responsibility when it comes to the housing challenges facing their community. They noted feeling pressure from the local community and frequently were, in their opinion, unfairly blamed for large problems that are out of their control. These factors complicate the work of MTW agencies and is a burden shared by many of the respondents in this study.

Responses to constraints

The three categories of constraints outlined above complicate the process of innovation for MTW agencies, and influence the outcomes that they can produce. While challenges are prevalent, MTW agencies continue to innovate in an effort to improve service delivery and support their clients. Existing literature has highlighted and evaluated a range of different innovations that MTW agencies have pursued. These examples demonstrate that despite challenges to innovation, MTW agencies use the flexibility provided by MTW rules to pursue new activities. In this section, instead of discussing specific innovative activities MTW agencies have undertaken as previous research has done, we highlight the strategic approaches of MTW agencies in the face of bureaucratic, resource, and market constraints through new strategies to overcome these challenges.

Responses to bureaucratic constraints

Because the bureaucratic constraints are outside of their control, MTW agencies are dependent on HUD and Congress to revise and amend the activities to modify or relax these constraints. For example, the anxiety and uncertainty that MTW agencies have around the temporary nature of the MTW Demonstration Program can only be eliminated if it is made permanent. The fact that Congress authorized the MTW expansion and HUD signed ten-year extension agreements for existing agencies provides some stability but given the amount of time it takes to renegotiate MTW agreements, many interviewees expressed a desire for a permanent program.

The one bureaucratic constraint that MTW agencies believe they can influence is reporting requirements. MTW agencies are exploring ways in which they can tell their story beyond HUD reporting requirements to highlight outcomes that are not captured in the mandated metrics. A broader communication of outcomes is vital to the MTW Demonstration Program which often comes under scrutiny for failure to evaluate implemented activities. MTW agencies are collaborating with HAI Group (a member-owned organization that provides affordable housing providers insurance, research, and training) and the Council of Large Public Housing Authorities (a nonprofit that provides advocacy, research, and policy analysis) to communicate the impact of their efforts. Given the mismatch between HUD-mandated reporting requirements and MTW activities and initiatives, MTW agencies have collectively started tracking their own metrics. A future goal of this effort is to work with HUD on updating the current reporting metrics to more accurately reflect the various activities that MTW agencies have adopted.

MTW agencies are also hiring staff to focus on community relations and outreach so they can tell their story to the public at large, rather than relying solely on metrics that are shared pursuant to mandated reporting requirements. Respondents highlighted a range of communication strategies including increased issuance of press releases, using infographics or Tableau intelligence dashboards, and greater use of social media. In addition, MTW agencies are finding new ways to share information from their annual reports in an accessible format including executive summaries or short papers with infographics on program outcomes. Some agencies are producing research reports and newsletters on a quarterly or more frequent basis. All these efforts are a response to the limitations of the HUD-mandated metrics to capture the full impact of innovative activities.

Responses to resource constraints

Analysis of the interviews highlighted that MTW agencies are finding many innovative ways to respond to resource constraints. Respondents repeatedly noted that MTW agencies must find new avenues to respond to the needs of their clients. Respondents noted that there are conspicuous needs in communities that are not being met through existing federal or local safety net programs, and these needs are present in the population of individuals and families who receive support from PHAs. The scope and nature of the response varies by agency and the interview responses provide fascinating insight into the approaches and strategies used by MTW agencies to respond to resource constraints. Existing scholarship notes that when PHAs respond to needs beyond housing, it forces them to balance the allocation of resources between bricks and mortar and supportive services (Greenlee, Lee, & McNamara, 2018). One of the interviewees commented that a housing authority is “a real estate development company with a social service mission.” PHAs must balance conflicting priorities to manage the development versus social service

dichotomy.

When deciding to expand the scope of operations by providing services, MTW agencies must decide on one of three approaches: a) provide the services directly, b) partner or contract with external agencies to deliver the services, or c) pursue a hybrid strategy combining the two approaches. The interviews revealed that many agencies have yet to determine where they fall on this spectrum, which creates ongoing tension regarding the allocation of resources. Because each approach requires different levels of resources (both staffing and financial), the availability of resources or the lack thereof may help to determine the appropriateness of a given strategy. Interview responses made clear that the development of in-house supportive services require outside funding. Therefore, external relationships and fundraising expertise are required for MTW agencies that seek to develop such captive services. Consistent with new research, PHAs reported a variety of different models to raise funds for supportive services, including creating a new nonprofit entity, collaborating with local partners, creating endowments, applying for federal grant programs, exploring non-federal grant funding, using operating funds from developer fees or cash flow from operations, and developing and owning market-rate housing (Kleit et al., 2019; Parkes, 2018). Innovative activities that center on service delivery highlight the financial constraints facing MTW agencies – to expand services, resources must be raised, and in many cases, partnerships must be established.

A second important emerging innovation in response to resource constraints is regionalization. The system of housing authorities in the U.S. is highly fragmented with over 3,900 PHAs (Kleit et al., 2019). Many of these authorities are very small and serve a small number of households. This fragmentation leads to increased overhead costs, reduced program effectiveness, and limits housing choice (Sard and Thorpe, 2016). In many industries, the inefficiencies associated with fragmentation lead to consolidation, but to date, there has been little desire among PHAs to consolidate (Sard & Thrope, 2016). Rather, MTW agencies are looking to an alternative strategy of establishing regional consortiums, which rely on a single funding contract with HUD. The funding arrangement with consortiums was proposed by HUD in 2014 but has yet to be finalized (Sard & Thrope, 2016).

Further steps on the notion of regionalization were taken by HUD in the 2016 MTW Expansion Statute. The concept of a regional agency was outlined in the MTW expansion statute (H.R. 2029 Section 239). HUD has proceeded to refine the concept and has sought comments on topics including what responsibility and control the regional agency has over other participating agencies, how regional partners are included in the evaluation process, and how regional agencies and their partners should properly govern themselves (Operations Notice for the Expansion of the Moving to Work Demonstration Program, 2017). Several of the main points received from the feedback during the comment period include: commenters argued against standardization of regionalization and asked that the agencies be allowed to propose their own regional structure; many commenters thought full MTW flexibility should be extended to regional partners although a few cautioned against this; and it was recommended that the governance structure of MTW agencies and the type of agreement should be determined by the agencies and communities and not HUD; (Columbus Metropolitan Housing Authority, 2017; CLPHA, 2017; Fischer, 2017a; MTW Steering Committee, 2017; NAHRO, 2017; Oberdorfer, 2017; PHADA, 2017; Thrope, 2017; Welch & Meehan, 2017).

Through the interviews, MTW agency officials informed us that they are exploring or

proposing regionalization to address affordable housing challenges and the loss of affordable housing units across a wider geographic area. Regional partnerships may facilitate cooperation to streamline portability of vouchers, promote mobility throughout a region, and develop project-based initiatives. As Greenlee et al. (2018) note, opportunities exist for collaboration between smaller, rural PHAs and larger, urban agencies that have a geographic advantage with more substantial resources and connections. These regional partnerships may be a source of mutual benefit and provide enhanced service delivery to participating households.

The third emerging innovation in response to resource constraints is the use of research to inform innovative activities. There is a general feeling that the MTW Research Advisory Committee created in the 2016 MTW Expansion Statute to advise HUD on policy changes adopted by different MTW agencies for the expansion could help facilitate innovation that can be applied to all agencies. The committee will also provide guidance on evaluation and research methodologies for new, innovative activities (Operations Notice for the Expansion of the Moving To Work Demonstration Program, 2018). The creation of this committee confirms the important relationship between research and innovation. Before new initiatives are pursued, potential approaches must be researched and baseline data needs to be collected. Once a new activity is started, proper evaluation requires diligent data gathering and analysis. By definition, MTW agencies are forced into a research role, even if those resources are not available within a given agency. HUD does not provide financial support for research activities and no universal framework has been established to help design new innovations. As a result, the role of research within MTW agencies is an important challenge for agency leadership.

While the research challenges of MTW agencies cannot be understated, this situation does present opportunities for MTW agencies and academic researchers. Researchers desire data and research opportunities, while MTW agencies need additional research skills. Marrying these needs and skills provide material benefits for all parties involved, and help inform and support innovative activities and policies at MTW agencies. The need for this type of partnership is particularly acute at smaller PHAs where staffing resources are limited.

Although several MTW agencies have already established university research partnerships, there remains a long list of potential topics that agencies would like researched. Examples of topics include, understanding program outcomes in varying housing market conditions, how future demographic shifts will alter service provision, the outcomes of households that exit PHA programming, how should PHAs get involved in the homelessness problem, understanding how to link administrative data with cross-sector data sources, and how to integrate behavioral health concepts into the housing system. This is a small set of intriguing research questions that could be pursued through expanding existing partnerships and creating new partnerships between MTW agencies and academic researchers.

Responses to market constraints

Two specific responses emerged in the interviews regarding market constraints. These responses are market-specific and correspond to different housing programs. The first pertains to housing agencies primarily located in the West that are in high-cost markets and have a large number of vouchers. The second response is attributed to housing agencies located in metropolitan areas that have a large and aging public housing stock. Responses to both market-specific constraints provided by the interviewees are consistent with and have been well documented in the literature. For example, innovations in the HCV

program discussed by the interviewees include, but are not limited to: creating more incentives for landlords to participate in the voucher program (e.g., Garboden, Rosen, DeLuca, & Edin, 2018; Khadduri et al., 2014); modifying program operations such as rent reform, longer time frames for inspections and recertifications or clustered inspections, increasing the time frame for lease up, creating submarket payment standards, and eliminating asset-based calculations under certain amounts (e.g., Cadik & Nogic, 2010; Khadduri et al., 2014; Webb et al., 2015); and converting more vouchers to project-based units above the 20 percent threshold (e.g., Brick & McCarty, 2012; Cadik & Nogic, 2010; Khadduri et al., 2014).

Interviewees highlighted that MTW status has allowed them to dedicate more funds to redevelopment activities than otherwise would be allowed without MTW status and frequently commented that MTW status has made the redevelopment process easier. Examples mentioned include streamlining activities to save money to use toward redevelopment, creating working capital pools or capital programs, and providing the ability to bridge financing activities. Activities PHAs have used for preserving and transforming large public housing stocks using Section 18 of the U.S. Housing Act of 1937 on Demolition/Disposition, Rental Assistance Demonstration (RAD), and the Low Income Housing Tax Credit (LIHTC) program has been covered in the literature in Brick and McCarty (2012), Cadik and Nogic (2010), Epp (1996), Hanlon (2012), Hanlon (2017), Lubell (2016), and Schwartz (2017), to name a few.

Discussion

In sum, the study findings help us understand the strategies and operations of MTW agencies. Given the importance of innovation in the creation of the MTW Demonstration Program, this study provides greater insight and clarity on the ways in which bureaucratic, resource, and market constraints hinder the innovative impulses of participating agencies. Throughout our interviews, MTW agencies repeatedly voiced how they continually search for new strategies and innovations despite these constraints. Bureaucratic constraints are the most difficult for MTW agencies to overcome since they are created externally and can only be alleviated by the controlling federal agencies. MTW agencies have the most flexibility around resource constraints and are designing innovative approaches and strategies such as MTW regionalization to leverage limited resources. Finally, market constraints are being addressed not only through agency-wide strategies but also through specific programmatic activities.

Similar to the findings of Abravanel et al. (2004), this study also finds that MTW status has prompted a change in agency behavior. MTW agencies have embraced their role as innovators, and have done so in unique ways. This is an important benefit of the demonstration program and evidence of a successful change in the culture and approach of MTW agencies. While the innovative cultures that have been created are promising, larger structural changes are required for MTW agencies to achieve their full innovative potential. Interview respondents highlighted three initiatives that would greatly enhance the potential for innovation at MTW agencies: 1) make MTW status permanent, 2) provide greater support for research and evaluation, and 3) revise HUD guidelines for reporting and metrics.

While processing the results from this study, it is important to recognize that this research represents the perspective of MTW agencies, not other stakeholders such as HUD, the local community, advocacy agencies, or program recipients. The agency perspective has not been highlighted extensively in the literature and is essential to understanding the environment in which innovation occurs. In policy debates about the MTW

Demonstration Program or its specific activities and outcomes, this study provides context to better understand the challenges MTW agencies encounter and the impact on outcomes. New research highlights the complexities of the policy environment in which PHAs operate (Kleit et al., 2019), and an appreciation for this complexity is essential when evaluating the outcomes of MTW agencies.

This research serves to inform PHAs that will be joining the MTW Demonstration Program soon. Feedback from existing MTW agencies provides helpful advice for agencies that are new to the demonstration program. Respondents encouraged new agencies to be realistic about the return on investment that they expect to achieve from new initiatives. They also advise starting with small initiatives and activities that are adopted as pilot activities before being implemented more broadly. Another key suggestion is that prior to beginning a new activity, it is important to identify baseline data, understand what metrics one will want to track to assess performance, and understand the time commitment involved. Also, one many want to consider the time and costs required for IT infrastructure changes. Failure to plan ahead may inhibit an agency's ability to monitor new activities. Existing agencies also suggest that new agencies should not recreate the wheel but rather collaborate with other MTW agencies when the opportunity presents itself. The MTW collaborative and conference offers the opportunity to exchange knowledge and information with other agencies. Last, existing MTW agencies suggest that new agencies should not delegate responsibility for MTW to one individual or several individuals. Rather, MTW should become part of the fabric of the agency in which all employees are involved.

Finally, this study is a call for greater attention from the research community given the substantial housing needs within our country. The innovative activities conducted by MTW agencies are at the forefront of housing policy. The expansion of MTW provides a unique, mutually beneficial partnership for MTW agencies and researchers. As the MTW Demonstration Program expands to include smaller agencies that are particularly resource constrained, there is a great need for research expertise within these agencies. More specifically, interview respondents highlighted a range of key research topics that could be the basis of productive scholarly collaborations. Given that PHAs are at the forefront of the federal government's efforts to address the considerable housing challenges in our nation, housing scholars have a unique opportunity to collaborate with MTW agencies to inform the future of housing policy.

Notes

1. Although most MTW agencies are public housing authorities (PHAs), not all are. For example, Alaska Housing Finance Corporation has MTW status but is a state housing finance agency. Only a small proportion of PHAs have MTW status but some of the largest PHAs are involved in the program.
2. The definition of self-sufficiency and the metrics to track it are not consistent across housing agencies. Generally, self-sufficiency is referred to as the process in which an individual or household increases their earned income so they are no longer dependent on public assistance or rental subsidies. Recognizing the multiple barriers that households face, such as physical or mental health issues that stifle economic earnings, many housing agencies have redefined the definition and metrics adopted to track a broader application of self-sufficiency.
3. Not all MTW agencies have the same funding structure. The funding agreement for each MTW agency is included in Attachment A of the MTW Agreement, which is publicly available on: https://www.hud.gov/program_offices/public_indian_housing/programs/ph/mtw.
4. MTW agencies primarily serve extremely-low income households, which are households earning under 30 percent of the area median income.
5. Challenges related to the HCV program are especially prevalent in high-cost cities in the

Western region of the United States. Approximately two-thirds of the MTW agencies interviewed are in the West which explains why many interviewees emphasized challenges related to the HCV program.

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