



PHA Policies and Practices That Promote Equity



PUBLIC AND AFFORDABLE HOUSING RESEARCH CORPORATION

This resource, based on a review of HUD guidance and research, describes a menu of strategies PHAs can adopt to advance equitable outcomes through their policies and practices. The breadth, depth, and scope of policies and practices PHAs pursue to advance equity will depend on many factors, such as local needs, funding, the historical policy environment, internal capacity, access to service providers, and more. Strategies in **green** are evidence-based strategies to promote equitable outcomes; strategies in **blue** are required by law.

While this guide describes strategies PHAs can take to improve equity in their resident outcomes, dismantling the long-term impact of discriminatory housing policies will require the collaboration and support of multiple partners. The impact of PHA strategies to improve equity can be affected by zoning and Source of Income (SOI) discrimination policies established by local governments, funding availability from HUD and community sources, the availability and capacity of nonprofit service providers, appropriations from Congress, and feedback from residents about the community they would like to create. To learn more about PHA-led equity initiatives, visit [How Public Housing Authorities are Addressing Equity](#).

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External Factors

- Funding for programs that expand housing choice, housing availability for hard-to-house populations, and resident services
- Inclusionary zoning policies
- Capacity of local service providers and community partners
- Local support for affordable housing
- Landlord participation in HCV program
- Anti-discrimination enforcement
- Community-wide investment in transit, health care, and educational resources
- Funding for emergency rental assistance
- Adequate fair market payment standards



Equity

Policies

Waiting list management

Waiting list policies that collect multiple contact methods, have broad application windows, and include preferences that meet community needs promote equitable outcomes by better positioning the most vulnerable families to receive housing assistance.¹

- Accept waiting list applications in multiple ways, including by mail, e-mail, and in person.
- Promote waiting list openings to underserved and disadvantaged populations.
- Distribute and accept waiting list applications over a wide window of time (HUD suggests at least 30 days).
- Select waiting list applicants via lottery.
- Eliminate waiting list residency preferences.
- Contact families on the waiting list by phone, e-mail, and mail.
- Establish reasonable periods for families to respond.
- Clearly explain the application and selection process.
- Consider admissions preferences for people from vulnerable groups, such as victims/survivors of domestic violence, persons with disabilities or those experiencing homelessness.²

Admissions criteria

Tenant screening metrics that balance protecting the safety of residents and consider the relevance of an applicant's criminal background can increase the likelihood that people with a criminal history, who are more likely to be people of color, are eligible to receive housing assistance.³

- Limit screening criteria to factors that affect resident and property safety.
- Limit and define the criteria and look-back periods. Research suggests limiting look back periods to a maximum of three years since that is when recidivism is most likely to occur.
- Eliminate indefinite look-back periods and categorical bans, except those legally required by HUD. (Research finds that the likelihood of recidivism decreases the most after one year and is comparable to a person without a criminal record after seven years.⁴)
- Consider steps towards rehabilitation and the time, impact, and seriousness of unfavorable information identified during screening. Recidivism is lower for those who are older first-time offenders⁵, employed⁶, who participate in rehabilitation programs⁷, have access to service providers⁸, have strong family connections⁹, and move to new neighborhoods upon release.¹⁰
- Only consider convictions during criminal background screenings. Do not include arrests, prosecutions, or acquittals.
- Offer families the option to remove a family member excluded from occupancy due to their criminal history.
- Notify applicants who are denied admission based on their criminal record and provide them with a copy of the conviction. Give them an opportunity to dispute the accuracy or relevancy of the information.
- Exclude criminal activity related to domestic violence, sexual assault, or stalking if the current or prospective tenant is the victim/survivor.
- Use a wide extent and timeframe of abuse when assessing eligibility for housing targeted victims/survivors of domestic violence.
- Exclude eviction cases if the tenant won, settled without admitting fault, or when the case was caused by an extenuating circumstance.
- Don't deny assistance based on age, race, color, religion, sex, sexual orientation, gender identity, national origin, family status, or disability status.
- Do not deny assistance based on family characteristics, such as whether there are children, single parents, or unmarried parents.
- Grant a reasonable accommodation for applicants whose household includes a person with a disability.
- Protect tenants' rights, such as through right-of-return and just-cause eviction policies, to minimize displacement.

Occupancy requirements

Occupancy policies that protect victims/survivors of domestic violence and position them to leave an abusive partner can shield these families from housing instability and promote their health and safety.¹¹

- Permit victims/survivors of domestic violence to terminate their lease early and award them an emergency housing voucher to permit them to leave an abusive situation.
- Ease restrictions on victims/survivors of domestic violence who seek to port their voucher.
- Grant extensions to people who missed deadlines or appointments due to abuse.
- Ease the burden of proof for survivors to access protections or waiting list preferences offered to victims of domestic violence.
- Develop family breakup policies that determine who has the right to remain in a unit. Give preference to victims/survivors.
- [Adopt policies that protect victims/survivors of domestic violence from being evicted due to lease violations caused by their abuser.](#)
- Establish just-cause eviction protections to protect tenants from arbitrary evictions.
- Ease compliance rules to promote program participation, particularly among individuals with mental health disorders.

Payment standards

Increasing payment standards in opportunity areas or adopting Small Area Fair Market Rents (SAFMRs) can make it easier for people of color to use Housing Choice Vouchers (HCVs) in low-poverty and high-rent neighborhoods, particularly if paired with housing counseling services, transportation assistance, and landlord recruiting.¹²

- [Adopt SAMFRs or increase payments standards to 110% FMR in high-opportunity areas to make these neighborhoods more accessible to voucher holders.](#)¹³
- Perform rental market studies in communities where FMRs severely limit housing and neighborhood options for voucher holders.

Personnel policies

Personnel policies that encourage organizations to attract and retain diverse talent can improve customer service and help PHAs develop policies and programs that promote equitable outcomes.

- Institute a family leave policy that is gender neutral.
- Incorporate gender-inclusive language in employee policies.
- Integrate equity and inclusion as a core value of the mission, vision, and goals of the organization.
- Monitor progress on equity and inclusion goals.
- Adopt hiring strategies that promote diverse recruitment, such as aiming to interview a candidate of color, including only those educational requirements that are actually necessary, sharing salary ranges, and suppressing names on resumes.
- Build transparent paths to leadership.
- Include LGBTQ-inclusive nondiscrimination requirements in contracts, grants, and partnerships.

Procurement

Procurement policies that include an equity component can expand access to culturally-sensitive service providers.

- Establish goals to increase contracts awarded to providers that are led by or serve underrepresented or disadvantaged communities.
- Equitably allocate funding to providers led by or serving underrepresented or disadvantaged communities.
- Evaluate whether contracted organizations are equipped to serve disadvantaged communities and advance racial equity. This can include evaluating whether the organization is represented, trusted, and accessible to the community it will be serving.
- Reduce barriers in the contract-selection process by considering the relevance of required experience and the length of questions in the application process. Include interviews with bidders.
- Develop a contract-review committee that is represented by the groups that will be served.
- Support new contractors by establishing an open line of communication; build capacity for smaller organizations by partnering with other community groups, and develop a transparent evaluation process.
- [Implement Section 3 to ensure that job, training, and business opportunities created using HUD assistance are made available to people with low-incomes. Evaluate needs, challenges, and outcomes between groups](#)
- [Promote inclusivity](#)
- [Target service offerings](#)

Sources: [waiting list management](#)¹⁴, [admissions criteria](#)¹⁵, [occupancy requirements](#)¹⁶, [payment standards](#)¹⁷, [personnel policies](#)¹⁸, and [procurement](#)¹⁹

Practices

Evaluate needs, challenges, and outcomes between groups

Comparing and tracking outcomes, such as service access and lease up, between different populations served can illuminate barriers to housing access.

- Collect community and resident input and consent regarding data collection efforts.
- Partner with a person or organization trusted by underserved and underrepresented populations to collect data.
- Disaggregate data by race, gender, and socioeconomic status as much as possible.
- Compare outcomes and resident needs across groups to identify gaps in service offerings.
- Partner with local government agencies to conduct an affirmatively furthering fair housing assessment to identify impediments to neighborhood choice.
- Prioritize programs to address communities facing the greatest challenges and involve community-members before making a decision.
- Monitor the performance and outcomes of services.
- Share data collection, metrics, and definitions across partner agencies and client groups served to promote cohesion.
- Share findings with partners or prospective partners to make the case for collaboration or to celebrate successes.

Promote inclusivity

Engaging in practices that promote inclusivity among staff and client groups served can help organizations develop policies and programs that are tailored to groups most in need, boost engagement among underserved or underrepresented client groups, and improve customer service.

- Adopt building designs standards that promote resident and neighborhood cohesion, particularly in mixed-income developments.
- Choose income targets and bedroom unit mixes for affordable units that match those of renter households from underrepresented groups.
- Market affordable properties in ways that are accessible to people of color, individuals with disabilities, non-English speakers, and older adults.
- Establish spaces that are inclusive for all gender expressions.
- Engage with community leaders and involve them in decision making to prevent structural racism.
- Develop a planning process that is accessible, transparent, and gives agency to marginalized groups.
- Develop partnerships with organizations trusted by people of color and marginalized client groups.
- Hire staff from backgrounds that align with tenant populations.
- Elevate a staff member on the PHA's leadership team to spearhead racial, equity, and inclusion initiatives.
- Inform residents and voucher holders who may experience discrimination about their housing rights.
- Translate material targeted to current and prospective client groups in multiple languages.
- Implement trauma-informed community building and engagement practices.²⁰

Target service offerings

Partnerships between housing and healthcare providers can promote positive health outcomes among residents²¹, which can promote equitable outcomes when targeted toward populations with the greatest health disparities.

- Recruit service providers that are trusted by underrepresented and disadvantaged communities.
- Partner with a community service provider to administer sponsor-based housing. The community service provider would send referrals and provide supportive services in exchange for the PHA setting aside homes to assist referred individuals.
- Offer services onsite to promote their use.
- Formalize partnerships with service coordination agreements or a memorandum of understanding to establish guidelines for the partnership.
- Coordinate long-term service offerings to support clients who have compounding traumas and challenges.
- Share funding streams and develop reoccurring funding sources to support service partnerships.
- Recruit multilingual service providers and staff to reach populations that speak languages other than English.

Target housing investment strategies to expand opportunities for residents

Intentional affordable housing investments in amenity-rich neighborhoods can promote equitable access and outcomes for underserved or underrepresented resident groups.²²

- Offer project-based vouchers in homes located in amenity-rich neighborhoods and homes connected to supportive services, with accessibility features, or that target groups that are traditionally underserved.
- Expand housing choice by intentionally developing or preserving affordable housing in amenity-rich neighborhoods.
- Advocate for comprehensive citywide planning, equity assessments, and zoning policy changes to remove barriers and build support for development that expands housing choice.
- Consider racial and ethnic disparities in siting and demolition decisions.
- Anticipate, understand, and counteract affordable housing opposition.

Revitalize neighborhoods

Investing in affordable homes and the neighborhoods they are located in can improve the living conditions and resources available to low-income families.

- Offer healthy and safe affordable homes across all neighborhoods and family sizes.
- Identify gaps in neighborhood amenities across properties and develop partnerships to bring services and opportunities to uplift residents.
- Enhance community health, education, transit, and employment opportunities by connecting affordable homes to public amenities.
- Proactively enforce building codes so that residents live in safe and stable homes.

Expand access to affordable homes

Increasing the supply of affordable homes can help housing providers assist underserved populations in their community.

- Leverage development tools, such as Low-Income Housing Tax Credits, Project Based Vouchers, HOME Assistance, national Housing Trust Fund, and state-funded affordable housing programs to expand access to affordable homes to narrow the affordable housing gap.
- Apply for special-purpose vouchers to expand the supply of affordable homes.
- Connect affordable homes to rental assistance where possible so that homes are affordable even for families with the lowest incomes.

Recruit landlords and offer support to voucher holders

Programs and practices that help voucher holders find a landlord willing to accept their voucher in a neighborhood that meets their needs can expand housing choice and voucher usage in tight markets and among vulnerable populations.

- **Recruit landlords to accept vouchers for families that traditionally have a more difficult time using their voucher, such as individuals with disabilities, persons experiencing homelessness, or large families.**²³
- Develop referral programs to encourage landlord recruitment.
- Establish a landlord liaison or hotline that allows PHA staff to address issues raised by landlords.
- Offer landlord events, like meet-and-lease days, briefing sessions, and awareness campaigns, as well as newsletters to dispel misconceptions and develop relationships with landlords.
- Fund a landlord risk pool to compensate landlords for potential damages or rent shortfalls they could incur by agreeing to house a hard-to-house population, such as criminal offenders.
- **Offer security deposit assistance or vacancy payments to entice landlords to accept vouchers.**²⁴
- Collaborate with social service providers and Continuum of Care (CoC) to align vouchers with community needs.
- Pair payment standard changes with housing counseling services, transportation assistance, case management, and landlord recruiting to help the most vulnerable groups overcome additional barriers to moving into these neighborhoods.
- **Provide voucher holders with search assistance to inform them about their housing options, help them fill out an application, and help them locate a home that meets their needs.**²⁵
- **Share data with voucher holders about neighborhood opportunity metrics as part of their housing search.**²⁶
- Ease administrative burden on landlords by adopting biennial inspections, developing a landlord portal, enabling landlords to self-certify minor repairs, and adopt electronic fund transfers.
- **Adopt SAFMRs or adopt higher payment standards in high opportunity neighborhoods.**²⁷
- Develop systematic procedures to award new vouchers to boost usage.
- Extend search time from 60 to 120 days for voucher holders.

Expand access to accessible affordable housing

Incorporating accessibility into the construction and preservation of affordable homes can help people with mobility limitations locate a home that will support their independence.²⁸

- Adopt universal design principles, such as wide doors, hallways, and stairway ramps to accommodate people with mobility limitations.
- Build or modify accessible homes near community resources, such as transportation, social service centers, and healthcare, to help people with disabilities thrive.
- [Enforce requirements for reasonable accommodations and modifications.](#)
- Connect voucher holders and residents to home and community-based services.
- Improve accessibility standards in new and existing homes and programs for individuals with sight, hearing, and mobility impairments.

Training

Training staff on trauma-informed care, racial biases, and peer-network building can help PHAs improve relationships with their residents and create policies and programs that advance equitable outcomes.

- Participate in national networks to learn from peers developing policies and programs to support equitable outcomes.
- Train staff on trauma-informed care to help them respond with empathy to residents that experienced trauma, such as victims/survivors of domestic violence.
- Offer racial bias training to ensure that tenants of all backgrounds are treated with compassion and respect.
- Train staff on cultural competency around race, ethnicity, gender orientation, and gender expression.

Sources: Target service offerings²⁹, evaluate needs, challenges, and outcomes between groups³⁰, expand access to federally assisted homes in areas of opportunity³¹, expand voucher utilization for hard-to-house populations³², training³³, expand access to accessible housing³⁴, training³⁵, and promote inclusivity³⁶, recruit landlords and offer support to voucher holders.³⁷

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