

Mandatory small area fair market rents (SAFMRs) and opportunity moves: implementation strategies of public housing authority (PHA) administrators

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Abstract

Purpose – In 2016, the US Department of Housing and Urban Development (HUD) promulgated the SAFMR rule to address the clustering of Housing Choice Vouchers (HCVs) in segregated and economically distressed areas. The rule was designed to set HCV subsidies based on average rents at the ZIP code level. This change from setting subsidies based on metropolitan-wide rents was intended to increase subsidies in high rent areas, removing barriers to “opportunity moves.” The purpose of this paper is to add to the literature by examining the perceptions of public housing authorities (PHAs) administrators about their experiences implementing SAFMRs.

Design/methodology/approach – In all, 24 metropolitan areas were mandated by HUD to implement the SAFMR rule. Data for this analysis came from semi-structured interviews with ten administrators in eight PHAs. The interviews took place during the fourth year of implementation under the SAFMR rule. The interviewees included a diverse group of administrators in terms of gender, race and the region where their PHAs were located.

Findings – The results of this study suggest that opportunity moves are encumbered by underfunding of the HCV program, the limited supply of affordable rental housing in opportunity areas and insufficient resources for supportive programs. Additionally, dissonance between definitions of opportunity moves that informed the SAFMR policy framework and PHA administrators’ perceptions of local opportunity structures contributed to the paucity of opportunity moves.

Research limitations/implications – This paper focuses on the perceptions of PHA administrators during the fourth year of implementing the HCV program under the SAFMR rule. This study relied on data from qualitative interviews with these individuals to understand the perspective of street-level bureaucrats. Qualitative data were not collected from elected officials, policymakers or HUD administrators. Secondary data and archival resources were used to understand these aspects of the SAFMR rule.

Practical implications – This paper’s focus on the perspective of street-level bureaucrats illuminates how ambiguities and omissions in the design of public policies produce inconsistencies in the policy implementation process. This focus also illuminates how street-level bureaucrats sometimes lack access to evidence-based data that policymakers used to design programs. In these situations, they reference field experiences and antidotal information to inform instead. A core contribution of this paper is a better understanding of the incongruence between evidence-based data, field experience and antidotal information effect policy implementation.

Originality/value – This paper focuses on the perspective of PHA administrators who implement affordable housing policies. The analysis provides insights into the perceptions and policy implementation strategies of



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Paper type Research paper

Introduction

This article examines public housing authority (PHA) administrators' experiences implementing small area fair market rents (SAFMRs) against the backdrop of local constraints related to available resources for the Housing Choice Voucher (HCV) program. In 2016, the US Department of Housing and Urban Development (HUD) promulgated the SAFMR rule to address the clustering of HCVs in segregated and economically distressed areas. The adoption of the SAFMR rule is one of the most recent policy innovations adopted to prevent the concentration of households receiving rent vouchers in areas impacted by high poverty and to facilitate their moves to opportunity areas. HUDs emphasis on deconcentrating poverty and increasing access to opportunity areas became a core goal of the HCV program after the Housing and Community Development Act was amended in 1998. To pursue this goal, the SAFMR rule was designed to set HCV subsidies based on average rents at the ZIP code level. This represented a change from the practice of setting subsidies based on metropolitan-wide average rents. The shift to SAFMRs was intended to make rent subsidies more reflective of average rents in smaller geographies. This is accomplished in two ways. First, the use of SAFMRs allows PHAs to increase subsidies in high rent areas, removing barriers to "opportunity moves" in areas with amenities linked to upward mobility (e.g. access to jobs, high performing schools, transportation and health care) [1]. Second, the use of SAFMRs allows PHAs to reduce subsidies in low rent areas, which creates disincentives for landlords to overcharge tenants and aligns rents charged for units in these areas with surrounding properties.

In all, 24 metropolitan areas were selected for mandatory implementation of the SAFMR rule in 2018. At that time, 181 PHAs administered the HCV program across those metropolitan areas. Data for this analysis came from semi-structured interviews with ten senior-level administrators in eight PHAs [2]. This analysis adds to the literature, as it examines the perceptions of senior PHA administrators about their experiences implementing SAFMRs and their interpretation of opportunity moves. The perspective of street-level bureaucrats (Lipsky, 1980) is not well represented in the existing literature on the HCV program. This article focuses on how street-level bureaucrats address ambiguities in policies that they implement. We find that rather than drawing from evidence-based data, street-level bureaucrats reference field experiences and antidotal information when policies do not align with constraints they face in practice.

Although there is a large body of literature measuring outcomes and perceptions of the HCV program for voucher holders and reflecting the perspectives of policymakers and academic researchers, less is known about how senior staff in PHAs who implement the HCV program perceive the program and participants' motivations [3]. Data collected from the interviews in this study provide insights into how the perceptions of PHA administrators influence their fidelity to core goals of the HCV program related to deconcentrating poverty and facilitating opportunity moves. Insights about how street-level bureaucrats apply their discretion in the policy implementation process add to the literature.

The interviews this analysis is based on took place in 2022 during the fourth year of implementation under the SAFMR rule. The results from the analysis suggest that opportunity moves are encumbered by the general underfunding of the HCV program, the limited supply of affordable rental housing in opportunity areas and insufficient resources for supportive programs like mobility counseling. Additionally, the analysis indicated that dissonance between assumptions about opportunity moves and PHA administrators' perceptions of local opportunity structures contributed to the paucity of opportunity moves.

This article elaborates on these findings. First, existing literature is examined to frame the relationship between the SAFMR rule and opportunity moves. Then, the results of our analysis are presented, as they relate to two thematic issues: implementation related barriers to opportunity moves and dissonance between the assumptions of the SAFMR rule and PHA administrators' perceptions of local opportunity structures. Finally, we make recommendations for the future roll out of the SAFMR rule drawing from the analysis.

Literature review

The evolution of the policy parameters for the small area fair market rents rule

The emergence of the contemporary housing choice vouchers program. This article builds on prior research examining the persistence of housing inequality for HCV holders despite efforts to promote their geographic mobility (Pendall, 2000; Basolo, 2013; DeLuca *et al.*, 2013; Patterson and Yoo, 2012; Wang and Walter, 2018; Rosen, 2020; Patterson, *et al.*, 2021; Silverman *et al.*, 2022). Historically, the HCV program has been amended to address barriers to housing mobility that emanated from its design and implementation. The program originated as the Section 8 certificate program under the Housing and Community Development Act of 1974. It was designed as a market-based intervention where local PHAs issued rent vouchers to low-income households. The vouchers were used to subsidize market rate rents in the private sector. By design, Section 8 provided subsidies to renters for market rate rents charged by private landlords. This has been the core focus of the program since its inception, despite subsequent amendments adopted to address inequities growing out of its design and implementation.

One of the most significant reforms to the Section 8 program involved the expansion of the geographic areas where vouchers could be used. During the 1990s, the Section 8 voucher demonstration program was created. This demonstration program allowed voucher recipients to use their rent subsidies anywhere in a metropolitan area that they chose [4]. This reform was intended to encourage the de-concentration of poverty and provide voucher recipients with greater access to low poverty neighborhoods. In 1998, these rules were applied universally to all vouchers and certificates through amendments to the Housing and Community Development Act which merged the Section 8 certificate and voucher demonstration programs. With these amendments, the Section 8 program was renamed the HCV program [5].

Despite these reforms and the HCV program's goal of using rent vouchers to increase chances for moves to low poverty neighborhoods, the program has continued to fall short (Meares and Gilderbloom, 2019). Largely, this has been the result of limited resources to implement the program, particularly with respect to mobility counseling, landlord education and the setting of rent subsidies in a manner that brings low poverty within the reach of tenants. This outcome has been documented in a large body of research on the HCV program. For example, Rongerude and Haddad (2016) used spatial statistics to examine the distribution of HCVs in the San Francisco Bay Area between 2000 and 2010. They found that over time, vouchers became more clustered in areas with lower housing prices, lower levels of educational attainment, higher poverty and larger African American populations.

DeLuca *et al.* (2013) used qualitative methods to examine the residential mobility of HCV recipients in Mobile, AL between 2009 and 2012. They came to similar conclusions, attributing these outcomes to tenants' limited housing search resources, landlord practices and deficiencies in the structure and implementation of the HCV program to promote opportunity moves.

Other research has found that even when HCV recipients move outside of core cities and find housing in suburban settings, they experience modest gains in terms of the socioeconomic makeup and amenities in their new neighborhoods (Feins and Patterson, 2005; Basolo, 2013; Wang and Walter, 2018) and tend to cluster in lower income and racially segregated settings (Covington *et al.*, 2011) [6]. For instance, Patterson and Yoo (2012) used spatial statistics to examine the moves of HCV recipients in the metropolitan area of Buffalo, NY between 2004 and 2008. They found that African American voucher holders who moved outside of impoverished and hyper-segregated areas of Buffalo were re-ghettoized in economically less advantaged suburban settings.

Demonstration programs aimed at promoting opportunity moves. In response to shortcomings in the HCV program's ability to promote moves to areas of higher opportunity, HUD has introduced several demonstration programs and rule changes aimed at enhancing voucher holders' housing choices and opportunities for upward mobility. One of the most studied was the moving to opportunity (MTO) demonstration program authorized under the Housing and Community Development Act of 1992. MTO was a 10-year program that provided Section 8 voucher recipients with enhanced mobility counseling. Five metropolitan areas (Baltimore, Boston, Chicago, Los Angeles and New York City) were selected to participate in the demonstration program. At the end of the demonstration program, mixed outcomes were reported (Chetty *et al.*, 2016). HUD's final evaluation of the program indicated that MTO participants gained access to low-poverty neighborhoods, but they did not show evidence of better educational, employment or income outcomes than non-program participants (US Department of Housing and Urban Development (HUD), 2011). Rosenbaum and Zuberi (2010) came to similar conclusions, arguing that more comprehensive mobility counseling strategies were needed to reverse historic patterns of inequality [7].

Another widely discussed HUD initiative is the Moving to Work (MTW) demonstration program. This program was approved by Congress in 1996, and by 2022, it had 126 PHAs participating. The program exempts PHAs from many HCV rules and allows for funding flexibility, so PHAs can pursue the goals of promoting housing choices and residential mobility for voucher holders. In practice, the demonstration program operates against the backdrop of growing austerity measures across many of HUD's other programs. Increasingly, the flexibility afforded by the MTW demonstration program has allowed PHAs to use funds allocated for HCVs to leverage and backfill funding gaps brought about by retrenchment in other programmatic areas (Webb *et al.*, 2016; Walter *et al.*, 2020). To some extent, PHAs participating in the MTW program have also experimented with the recalibration of HCV subsidy level to incentivize moves to higher opportunity areas.

However, the MTW program is criticized for a lack of systematic evaluation of program innovations adopted by PHAs (Webb *et al.*, 2016; Government Accountability Office [GAO], 2018; Stacy *et al.*, 2020). A 2018 Government Accountability Office report detailed the deficiencies of the MTW program, citing HUD's lack of monitoring of PHA implementation and the tendency of MTW participants to hold more voucher reserves than non-MTW agencies as problematic. This was corroborated by Stacy *et al.* (2020). Despite these deficiencies, Congress authorized HUD to add an additional 300 PHAs to the MTW program in 2015 (Fischer and Sard, 2015).

At the time of this authorization, both the House of Representatives and the Senate were under Republican leadership. [Fischer and Sard \(2015\)](#) argued that the expansion of the MTW program was primarily motivated by legislators' goals to fragment and deregulate the voucher program, rather than to expand voucher holders' access to opportunity areas. The rollout of MTW expansion was slow during the Trump administration, but then accelerated in 2021 after the transition to the Biden administration. In 2021, HUD expanded the cohort of PHAs participating in the MTW program from 38 to 78 ([US Department of Housing and Urban Development \[HUD\], 2022](#)). In 2022, the number of PHAs participating in the MTW program increased to 126 ([US Department of Housing and Urban Development \[HUD\], 2022](#)).

The small area fair market rent rule as a tool for anchoring payment standards to smaller geographies

Unlike the MTW program, which is implemented variably across PHAs based on local constraints and priorities, HUD introduced reforms to how individual rent subsidies for HCV holders are set by local PHAs in 2016. These reforms were designed to make payment standards (which are the maximum amount of subsidy PHAs allowed for an HCV holder) more reflective of market rate rents in smaller geographies. These reforms were introduced as an administrative rule for the implementation of SAFMRs ([Federal Register, 2016](#)). Historically, payments standards were based on FMRs which represent the 40th percentile of gross rents across metropolitan areas. Under the older FMR rule, voucher holders were only permitted to rent units that were at or below FMRs in a metropolitan area. This rule made it impossible for vouchers to be used in higher rent areas without a special determination by HUD. Under the new SAFMR rule, payment standards are based on the 40th percentile of gross rents in ZIP codes. The new rule was expected to provide HCV holders with greater access to high-opportunity neighborhoods, as payment standards based on SAFMR were set in reference to smaller geographies where rents varied widely. In 2018, implementation of the new SAFMR rule was mandatory across 172 PHAs in 24 metropolitan areas [\[8\]](#).

[Patterson and Silverman \(2019\)](#) evaluated first year implementation of HUD's SAFMR rule and concluded that many PHA administrators lacked a high degree of fidelity to the equity goals of the new rule. [Patterson and Silverman \(2019\)](#) found that most PHAs mandated to use SAFMRs set payment standards at relatively lower levels in high opportunity ZIP codes than they did in lower opportunity ZIP codes. The inversion in the setting of payment standards created disincentives for moves to higher opportunity areas. Moreover, nine of the PHAs in the 24 metropolitan areas mandated to use SAFMRs already participated in the MTW program. These nine PHAs were among the largest in the country. They administered 32.21% of the vouchers across the 24 metropolitan areas. Of the nine PHAs participating in the MTW program, eight requested an exemption from the SAFMR rule and continued to set payment standards using alternative methods. To varying degrees, the approaches to setting payment standards adopted by these PHAs were less consistent and identified fewer opportunity areas in their boundaries than if the SAFMR rule was adopted. In short, [Patterson and Silverman \(2019\)](#) concluded that the rollout of the SAFMR rule was slow, although it had the potential to incrementally improve as PHAs gained more experience using SAFMRs. This finding is consistent with other literature on the implementation of the SAFMR rule and its juxtaposition to other rental assistance policies ([Reina et al., 2025](#)).

There were also conditions outside of the immediate control of local PHAs that hampered the rollout of the SAFMR rule. In 2017, the Trump administration attempted to delay implementation of the SAFMR rule but was defeated in the courts. When implementation

began in 2018, there was additional confusion on the ground level for tenants and landlords, as some of the largest PHAs in metropolitan areas mandated to use SAFMRs were exempted from the rule because they were MTW participants. The implementation of the SAFMR rule was further complicated by the impacts of the COVID pandemic on rental housing markets across the country. During this period, there were moratoriums on evictions at the national and state levels, and PHAs had to adapt to restrictions related to social distancing which impeded their ability to fully implement local strategies to promote opportunity moves. PHAs were also hampered with additional responsibilities during the COVID pandemic, as they administered an expanded number of emergency vouchers and other housing assistance designed to meet the immediate needs of tenants during the crisis.

During the first four years of the SAFMR rule's implementation, 172 PHAs in 24 metropolitan areas made the transition to setting payment standards based on SAFMRs. A small number of PHAs in other metropolitan areas also voluntarily shifted to setting payment standards based on SAFMRs during that period. Although residential patterns for the vast majority of HCV holders remained relatively unchanged, the SAFMR rule expanded housing choices for some voucher holders during its initial years of implementation. These modest outcomes can be attributed to PHAs' learning curve during the transition to SAFMRs, limited support from the Trump administration and contingencies growing out of the COVID pandemic. Nonetheless, under the SAFMR rule's provisions, HUD announced the expansion of the number of areas mandated to use SAFMRs in October of 2023. Beginning in 2024, an additional 41 metropolitan areas were mandated to use SAFMRs. Considering the limited research on early implementation of the SAFMR rule and the expansion of metropolitan areas mandated to use SAFMRs, this analysis sheds light on PHA administrators' experiences with the implementation of the rule. In particular, the focus of this analysis on how street-level bureaucrats apply their discretion in the implementation of the SAFMR rule illuminates how PHA administrators navigate ambiguities in and changes in policy.

Methods

In all, 24 metropolitan areas were selected for mandatory implementation of the SAFMR rule in 2018. At that time, 181 PHAs administered the HCV program across those metropolitan areas, and 172 of them were mandated to use SAFMRs. On average, there were 7.2 PHAs in each metropolitan area administering the HCV program under the SAFMR rule. The vast majority of HCVs were administered by one or two large PHAs in a metropolitan area. Typically, the PHA was in the core city of a metropolitan area or a PHA that served a countywide or regional area. Other PHAs were in municipalities outside of core cities and administered a small number of HCVs. The remaining nine PHAs were in the MTW demonstration program and exempt from the SAFMR rule [9]. It is noteworthy that these exempted PHAs administered the majority of the HCVs in their respective metropolitan areas (Patterson and Silverman, 2019).

Interviews were requested with PHAs that were mandated to use SAFMRs and administered 1,000 or more HCVs. There were 68 PHAs that met these criteria across all of the 24 metropolitan areas. On average, there were 2.8 PHAs in each metropolitan area meeting these criteria. A cluster sample was drawn from the population of PHAs in the 24 metropolitan areas. We began by requesting interviews with the senior staff member at the PHA administering the most vouchers in a metropolitan area. Once an interview was scheduled in a metropolitan area, we moved on to the next metropolitan area and repeated the recruitment process. During the interviewing and recruiting process, we coded and did preliminary analysis of the data as part of an iterative process. This allowed us to determine when a point of data saturation had been reached.

PHA senior staff responsible for the design and administration of the HCV program were recruited for interviews. These individuals were the directors of the PHAs or other high ranking senior staff members responsible for designing and implementing the HCV program. As a group, senior PHA staff comprised a group of key informants who illuminated the perspective street-level bureaucrats responsible for the implementation of the HCV program. These individuals were identified using the PHA websites and staff directories. A semi-structured interview guide was used that included five grand tour questions and 16 probes. Interviewees were asked four grand tour questions about their PHA's experience and implementation strategies using SAFMRs, their assessment of best practices in SAFMR administration, tenant and landlord considerations and other perceptions they had of the SAFMR implementation process. The questions were followed up with probes. Each interview was conducted face-to-face on Zoom and lasted approximately 1 h. Each interview produced a transcript that was approximately 30 pages of single-spaced text. This methodology for qualitative data collection and analysis followed the in-person interviewing approach described by [Silverman and Patterson \(2022\)](#).

At the end of the recruitment process, interviews were conducted with ten administrators from eight PHAs. Data were collected from one-third of the metropolitan areas mandated to implement the HCV program under the SAFMR rule. The interviews took place between January and June of 2022, during the fourth year of implementation under the SAFMR rule. The interviewees included a diverse group of senior administrators in terms of gender, race and the region where their PHAs were located. [Table 1](#) summarizes the characteristics of the interviewees.

Verbatim transcripts from the interviews were analyzed using the *Taguette* qualitative data analysis software package. The analysis involved open and focused coding techniques and the constant comparative methods for qualitative data analysis described in [Silverman and Patterson \(2022\)](#). After collecting data from these interviewees and doing preliminary analysis, we had reached a point of data saturation where nuances in the PHAs' experiences had been identified, and we had developed a multifaceted understanding of the perspective of street-level bureaucrats who were mandated to use the SAFMR rule.

Table 1. Characteristics of public housing authority administrators interviewed ($n = 10$) and public housing authorities ($n = 8$)

| Variables | <i>n</i> | % |
|---|----------|------|
| <i>PHA administrators</i> | | |
| <i>Gender</i> | | |
| Female | 5 | 50 |
| Male | 5 | 50 |
| <i>Race</i> | | |
| Black | 3 | 30 |
| White | 7 | 70 |
| <i>PHAs</i> | | |
| <i>Regions</i> | | |
| Northeast and Mid-Atlantic (CT, DC DE, NJ, PA, MD and VA) | 3 | 37.5 |
| Southeast (GA, FL, MS, NC and SC) | 2 | 25 |
| Midwest (IL and IN) | 1 | 12.5 |
| West (CA, CO, HI and TX) | 2 | 25 |

Source(s): Authors' own creation

Findings

This section presents a narrative of the findings from the analysis of PHA administrators' experience implementing the SAFMR rule. The narrative focuses on two thematic issues that provide extensions to topics discussed in the literature review. The first thematic issue delineates PHA administrators' perceptions of implementation-related barriers to opportunity moves. The second thematic issue describes dissonance between the assumptions of the SAFMR rule and PHA administrators' perceptions of local opportunity structures. The narrative illustrates how, like other street-level bureaucrats, PHA administrators navigate the impasse between the evidence-based data that informs policymaking and their reliance on field experiences and antidotal information to inform policy implementation.

Administrators' perceptions of implementation-related barriers to opportunity moves

Barriers linked to neighborhood amenities and social institutions. Implementation of the SAFMR rule takes place against the backdrop of several constraints associated with the HCV program. Although it is HUD's largest rental assistance program, accounting for almost half of the agency's annual budget for discretionary programs, the HCV program remains underfunded and assists only a fourth of program eligible households. The program's implementation is also fragmented across PHAs within and across metropolitan areas. This creates a situation where households are offered different subsidy levels in the same metropolitan area based on the PHA that administers their voucher (Patterson and Silverman, 2019). Moreover, some PHAs in the same metropolitan area participate in other HUD demonstration programs, like the MTW program, which operates under different rules than the regular HCV program. These constraints and idiosyncrasies of HUD rental assistance programs can be a source of frustration and confusion for program administrators and participants.

Still, the overarching goals of all of HUD's rental assistance programs are to deconcentrate poverty, promote racial desegregation, support low-cost rental markets and provide households with opportunities to access affordable housing in communities of their choosing. The SAFMR rule was designed to improve on past efforts to achieve these goals by calibrating payments standards to rents at the ZIP code level. This innovation was designed to lower barriers to opportunity moves, as areas with higher rents were thought to have amenities that benefit low-income households. Among these amenities are higher-quality public schools, stronger job markets and access to transportation. Despite these benefits, all the PHA administrators who were interviewed in this study reported that opportunity moves were the exception rather than the rule for most HCV households.

The PHA administrators identified several barriers to opportunity moves. Some were linked to transportation and the built environment. One PHA administrator made these comments about how limited access to transportation was a barrier to opportunity moves:

[Opportunity areas in] this county don't have public transportation to the levels that [other areas] do. You can get around and get around by bus. But for the most part, the county hasn't made the investments. Some of our neighboring communities have light rail that takes a little bit more time. So, when it comes to employment, and it comes to getting to your job, and being able to get around, and the expenses of cars and insurance, and all that other sort of stuff, most folks have chosen to remain.

Other PHA administrators added that older "pre-World War Two" communities where HCV holders already lived were more "walkable" and "transit friendly" and had community infrastructure. In contrast, many of the more affluent ZIP codes that were considered

opportunity areas were low-density, automobile-oriented communities that lacked public transportation. As one PHA administrator put it, “most affluent ZIP codes are frankly suburban sprawl, bedroom communities, with limited employment opportunities, so we just haven’t seen this massive shift of vouchers.”

Beyond transportation and the built environment, the PHA administrators discussed how they believed voucher holders were less apt to make opportunity moves because they would lose access to social support networks in their current neighborhoods. Moving to a new “opportunity area” often meant that voucher holders would have to leave the “place where they grew up.” The tradeoff between moving to an unfamiliar area with better amenities and remaining in familiar surroundings was not a simple transactional choice. It entailed severing family ties and institutional affiliations. As one PHA administrator put it, voucher holders chose to remain in lower rent neighborhoods, partly because, “their mother is around the corner and their church is down the street, and you know, it’s familiar.”

The perception among PHA administrators that voucher holders desired to remain in familiar surroundings was viewed as an innocuous outcome. It was also influenced by concerns that voucher holders might encounter discrimination and racism in new surroundings after making opportunity moves. One PHA administrator commented on how segregation patterns in the county where he worked set the parameters for where voucher holders conducted housing searches:

We have a southern part of the county that’s predominantly African American and that’s where people are comfortable. The county is predominantly African American at this point, but there’s more upward movement in the central part of the county when there’s more of a mix. Very far north is the mostly white population. People are just not trying to move up in that area as much.

Considerations related to discrimination and racism were perceived to be more pronounced for some segments of the HCV population. For example, one PHA administration discussed the calculation that parents must make when deciding to move to an opportunity neighborhood:

A lot of times it’s families with kids. You may provide them with an opportunity to move to an area of greater opportunity, but there’s stigmas that come along with that. I think in the end children bear the brunt of that sometimes. Why would you move your kids to a place where everyone knows that they’re not from? I mean, they’re just those things that come along with it. There are a lot of factors that just factored into why folks may or may not have participated in [a mobility program]. It wasn’t just a simple as, ‘oh they’ve got a great opportunity to be in a new school system.’ It really all depends on, I think there’s a demographic to that too.

One of the core rationales of the SAFMR rule is that it allows families to make opportunity moves to neighborhoods with higher performing schools. The educational benefits that children gain from opportunity moves are assumed to be a primary motivation for moving. Yet there is a perception among PHA administrators that other considerations linked to discrimination in society can dissuade voucher holders with children from making opportunity moves.

PHA administrators reported that they believed voucher holders took several barriers linked to neighborhood amenities and social institutions into account when weighing their options about making opportunity moves. Even when PHAs offered higher payment standards to move to areas that were identified as amenity rich, there were tradeoffs related to transportation, the built environment, social networks and institutional ties to consider. PHA administrators believed that voucher recipients filtered all these tradeoffs through the lens of the broader racial climate they were embedded in.

Barriers linked to payment standards not keeping pace with increasing rents. If the initial hurdles related to barriers linked to neighborhood amenities and social institutions were cleared, then voucher holders still needed to deal with the economic context that SAFMR implementation was embedded in. The first issue of this type identified by PHA administrators was whether payment standards kept pace with rising rents. This was an issue that encompassed the entire rental market, in terms of both rental property in high rent and low rent areas.

All of the PHA administrators discussed how rents were rising rapidly in their metropolitan areas, and that they routinely set their payment standards at the maximum level allowed by HUD or higher to keep up with rising rents. Under the SAFMR rule, PHAs were allowed to set payment standards as high as 110% of SAFMRs. To exceed that level of payment standard, PHAs were required to conduct a rent study and ask HUD to approve an exception payment standard. One PHA administration discussed her agency's strategy this way:

You can set rents and work at 90% to 110% [of SAFMRs] without getting HUD approval. We actually did go into getting higher than that. You can go anywhere from 90% to 110% and you can adjust. We don't have anything under that, we're all at 110 at this point. We're trying to increase in order to allow families to have the maximum amount they can. Because, even with those rates, very few units are meeting our payment standards.

PHA administrators explained that rents had been increasing for several years in response to rising real estate prices. This situation was aggravated during the COVID pandemic, as existing units were not becoming available for rent during the eviction moratorium and new construction had slowed. As things began to reopen in the post-pandemic period, rents began to rise again, because of the same underlying market conditions that had driven inflation in the housing market earlier. Another PHA administrator explained the effects of rising rents on the implementation of the SAFMR rule this way:

This new world has affected both rents and payment standards. In the most unbelievable ways, and far more than small area fair market rents can assist us with right now. Rents have exploded here. We've actually even had to ask for a waiver to exceed the payment standard and go up to 120%. It affects leasing rates overall. We're just struggling to break, fairly recently, to hit 60% success on leasing.

All the PHA administrators discussed their efforts to adjust payment standards in response to rising rents. They faced a general dilemma where the SAFMRs calculated by HUD each year, and the payment standards that were based on them, could not keep up with rental markets in real time. Several of the PHA administrators thought that HUD needed to update SAFMRs more frequently and move to a system where they were published multiple times annually.

Barriers linked to a limited supply of rental units. In addition to rising rents across the entire market, PHA administrators discussed a problem more specific to opportunity neighborhoods. This was the limited supply of affordable rental units in these areas. One PHA administrator described how this impeded opportunity moves in his metropolitan area:

[High rent ZIP codes] might even have 25 units. It might be a really small number of units that are actually, in theory, accessible under the small area fair market rent program now. They were not accessible before the program, so that's a benefit, I suppose. But, the fact that each of the ZIP codes don't have the same number of rental units distorts some of the perception of the small area program. I can pay \$2300, but in that expensive ZIP code, there's not that many units available. You have just fewer units to begin with.

Another PHA administrator put it more succinctly, saying that higher rent “ZIP codes have very, very, very few rental units, period.” On top of a situation where rent increases were outpacing payment standards, there was the added problem of a relatively smaller number of units to choose from in opportunity areas.

Barriers linked to insufficient resources for mobility counseling. Making opportunity moves entails navigating barriers linked to transportation, neighborhood and social infrastructure, prohibitive rents and a scarcity of housing units to choose from. These obstacles are daunting to voucher holders and navigating them was made more difficult, as there were few resources earmarked to PHAs implementing the SAFMR rule for mobility counseling. Moreover, there are no universal guidelines for mobility counseling for PHAs to follow. Instead, PHAs drew from other program resources and augmented existing tenant education practices to facilitate opportunity moves. One PHA administrator explained that his agency addressed this gap by putting its own piecemeal “upward mobility” program in place. When describing it, he emphasized that, “we’ve put it in place, but again, HUD doesn’t really pay for it.”

Other PHA administrators discussed how they leveraged existing agency resources and designed tools to assist tenants in their search for housing in opportunity areas. During the COVID pandemic, agencies took advantage of expanded access to video conferencing technology, like Zoom, to disseminate information about SAFMRs. Virtual meetings made it easier for some voucher holders to receive housing counseling, as they could attend them remotely. However, these innovations were not accessible to all tenants, and other PHA administrators described how onsite tenant counseling was added in PHA offices and at satellite locations. As one PHA administrator put it, “even though Zoom is good, I think it’s a good first step, face-to-face is very important.” Another PHA administrator described how her agency had scaled up its tenant counseling efforts after the SAFMR rule was mandated:

[We now] give briefings that are available for everybody to attend. You can do in person or through Zoom briefings and anybody can stay and ask questions. We have a full presentation. We explain the payment standards and how it works, and what you need to do. We do that for anybody who’s new to the program or moving. [If tenants are] new the program it’s mandatory, for the movers it’s optional, but anybody can come and ask questions.

It was important for PHAs to augment their tenant education and counseling efforts, as the implementation of the SAFMR rule entailed offering tenants different payment standards based on the ZIP code they planned to move to. As one PHA administrator explained, “it took a while for us to create all that material and information, so that our staff were equipped with the right resource information, and they knew how to explain that to families.” The development of these materials and policies was part of the initial ramping up for implementation of the SAFMR rule and entailed additional administrative effort at the PHA’s expense.

The PHA administrators explained that the development of tenant counseling and assistance was part of a broader patchwork of programmatic activities. For example, some families and disabled tenants in the HCV program had case workers in the social welfare system who advocated for them and provided additional services. This meant that mobility counseling efforts often entailed educating tenants and landlords about the SAFMR rule, as well as providers in other agencies who tenant services had to be coordinated with. These aspects of the implementation process were often done on a piecemeal basis without guidance or resources from HUD. The lack of a built-in mobility counseling component to the SAFMR rule with comprehensive wraparound services impeded opportunity moves.

Dissonance between the assumptions of the small area fair market rents rule and public housing authorities administrators' perceptions

The divergence of principle and practice. In principle, the PHA administrators expressed support for the use of SAFMRs as a tool to leverage opportunity moves. One PHA administrator's fervent support for the SAMFR rule and the need for its mandated use came through in these comments:

When this whole idea of small area fair market rents came about, I jumped on it. I think it's one of the best things, one of the two or three best things that HUD has ever done. In my mind, you can talk all you want about spatially locating folks, and reducing segregation, and socio-economic inclusion, and all that. But, if you can't pay the rent you just can't do it. So, in my mind, everybody is paying lip service to this. But at the end of the day, you got to be able to pay the rent. So, that's a little background on how we got involved. I was very happy to see this mandate come. I know it was a controversy for the Trump administration, but [we] got it. Thank God it's the law.

Other PHA administrators expressed strong support for promoting geographic mobility and opportunity moves as well. However, support for the general principles of the SAFMR rule butted up against barriers they encountered when attempting to implement the rule.

In addition to the barriers to implementation discussed earlier in this section, PHA administrators identified the lack of sufficient funding from HUD for the HCV program as a constraint. All PHAs work with a finite pool of funds to administer the HCV program, and this impacted decisions about setting payment standards and the level of mobility counseling that could be offered to voucher holders. One PHA administrator made these observations about how budgetary constraints led to a slow roll out of the SAFMR rule:

[Our] budget authority is nowhere close enough. But, I'd say our experience has been okay. The reason I say that is because, I think it was 2018 when HUD required us to use the SAFMR. That was when it kicked in. I just want to be clear, philosophically, conceptually, policy wise, we support the goal of small area FMRs. But like many federal rules and regulations, they get lost in translation. [In terms of] their real-world impact. In our jurisdiction. In our voucher program. If you look at the top quintile of ZIP codes, we already had at the time when small area fair market rents were required about 12% to 15% of our vouchers under lease in the top quintile of ZIP codes. So yeah, you could argue it's not entirely representative, but it's reasonable. I think that's sort of a reasonable, statistical percentage of vouchers in the most affluent communities.

This PHA administrator went on to explain that the proportion of his agency's vouchers that were used in the top quintile of ZIP codes remained at about 15% after implementation of the SAFMR rule. In essence, this administrator felt there was no noticeable increase in opportunity moves after adopting the SAFMR rule. Breaking that threshold was impeded by budgetary constraints and other barriers to implementation. Similar outcomes were reported by other PHA administrators.

Opportunity is just one move away. The lag in time between the implementation of the SAFMR rule and voucher holders making opportunity moves was also impacted by time limits HUD gives voucher holders to find new apartments. PHA administrators reported that it often takes voucher holders the maximum time allowed by HUD to identify a unit to rent, and finding a unit in an opportunity area is more time consuming. This is because of the limited supply of affordable units in those areas, the smaller pool of landlords participating in the HCV program, transportation constraints and other logistical barriers to identifying available units.

The PHA administrators were universally confronted with these constraints and barriers. One strategy they adopted to address them was to encourage new voucher holders to use their

vouchers in their current residences, then plan for opportunity moves later. One PHA administrator described this strategy in detail:

I've counseled staff to encourage new participants that come in the program [to plan for a second move]. The [voucher holder's] mindset is that they waited too long to get assistance. The mindset is, "now I have assistance, I can move now," which ties in to that small area fair market rent concept. "I now can go somewhere that I really want to." But what we find, is a success rate in leasing is what we're counseling people to do right now. Once you're on the program, if you take too long to find housing, you lose your opportunity, after you've waited years for assistance. Oftentimes, the participant has in their mind [to make an opportunity move], and then they're in this panic of, "no, you can't terminate my voucher." I have to get this [voucher] leased up. This mindset is to increase our [PHA's] leasing success, so that we're spending, we've got to spend things down. Nobody wants their funds recaptured. [The strategy] is to get people to lease in place first. Just lease so that you can get in an apartment right now. We lease you even if you hate your apartment. You're done. You at least have assistance. Now you can take time, you can even ask us six months down the road to grant permission to move outside of our rules. Typically, we ask you to wait one year and then you can move. But again, sometimes that's what we have to do, to do it. Those are the things we do. We're trying to get the lease up done, and then seeing if they move afterwards.

Another PHA administrator reinforced this point saying, "I've often found that that second move is the so-called opportunity move." The general approach that PHA administrators followed was to lease up tenants in their current location, then provide what mobility counseling was available to plan for future moves. As a PHA administrator described, after an initial lease up:

We do follow up counseling with the households. They went into mobility counseling. It's a very difficult thing to do. I know our numbers. While there okay. I want these numbers to increase.

Generic definitions and white privilege. Implementing the SAFMR rule was challenging. Although PHA administrators agreed with the overarching goal of promoting opportunity moves, they were sometimes hamstrung by the lack of specification related to targeting resources and generic definitions of what constituted an opportunity area. Although not explicitly stated, the general tenor of discussions about the rule suggested that a primary constituency expected to benefit from the SAFMR rule was households with school age children. The benefits of the SAFMR rule for these households were discussed by all of the PHA administrators. One PHA administrator explained how this shaped the way his agency structured the implementation of the SAFMR rule:

My overarching goal with the program was to give kids, families, a chance to break the cycle of poverty. So that's when we targeted differently. We went after the households that had children in them. When we do our briefings, we point out the benefits of that. We went about our targeting differently, but nobody's excluded from the program. As I said, that that's the population that I think can benefit the most. Not to say that a 64-year-old individual could move from [a low rent area] where we have a lot of people to [a high rent area] where you know there's just shopping right across the street, the doctor's office is next door. I mean that's huge. That's a huge benefit. Those folks certainly aren't excluded. But like I said, I think that the future of this program is to target families.

Other PHA administrators made similar comments about their agency's targeting strategies. One summed it up saying, "like everybody else, we definitely are putting an emphasis on families with children." When discussing their targeting strategies, PHA administrators pointed to academic research that suggested, "kids moving into high opportunity

neighborhoods have a better opportunity of success in their overall life, and getting out of poverty, and breaking the poverty cycle.”

Although the SAFMR rule was not explicitly designed to target families with children, PHA administrators would frame their implementation strategies to achieve this goal. For example, when recertification packages were sent to existing voucher holders, information about the SAFMR program emphasized benefits that opportunity moves would have for children. As one PHA administrator described, “we do targeted outreach to families with children, and then we have specific mobility briefings.” This was echoed by other PHA administrators who pointed out that their agencies would frame communications and other materials that were distributed to voucher holders in ways that emphasized the benefits of opportunity moves to children.

Other PHA administrators pointed out that identifying these benefits was complicated by dissonance between national policymaker’s assumption based on empirical evidence considered during the policymaking process about what constituted an opportunity area and their own definition of what constituted an opportunity area which was largely based on field experiences and antidotal information. This dissonance was compounded by these PHA administrators’ perceptions that policymakers did not fully consider race when developing a framework for defining opportunity and mobility counseling programs. One PHA administrator elaborated on this deficiency in the framework undergirding the assumption about opportunity areas that informed the SAFMR rule:

We have 22 school districts in our jurisdiction. Twenty of them are sort of high performing, or very high performing by any national standards. Two of them are sort of average performing on a national perspective, or maybe slightly below average performing. Those 2 districts happened to be where primarily families of color live. We’re not talking like what you would see in major city school districts. Like you know Philadelphia has many challenges, Baltimore has many challenges. We’re talking they don’t perform up to the above average standards that many of the other 20 school districts in our county do. They’re mostly average or a little below average performance. But still, compared to really disinvested big city urban schools, they’re still fairly well funded, stable, with long time caring administrators, teachers, etc. Again, sort of anecdotally, because we’re not actually tracking this kind of thing, but I’ve had many, many, many conversations. The vast majority of the 20 high performing districts are very high performing. They are almost all white right 90% plus, 95% plus in some cases. A voucher holder family with kids who happened to be of color, might move to that jurisdiction and their kids don’t have a good experience in the schools. There’s an enormous ratio achievement gap across all of these 20 school districts. They felt more comfortable, which is always sort of hard to quantify or measure, in the school district that they left, because there was an African American principal, and there were Latino teachers, and there were African American teachers, and there were kids of color in classrooms. Every kid wasn’t the only kid, the only black kid or the only Latino kid in a class. Education folks can tell you there’s all kinds of impacts, for all that, micro aggressions and everything else. In some ways, many of these families have not wanted to move. Because as a practical matter, on a daily basis, the educational experience was better in a reasonably well funded, public school system that is representative. You know, you have a much larger percentage of kids and administrators, leaders of color. I mean, they’re beyond just curriculum and kind of performance measures. There are all kinds of other factors that people look for to get the right fit for a school. I think the Inside-the-Beltway policy think tank folks sometimes miss this.

This was not an isolated critique of the framework for defining what constitutes an opportunity area. The issues of racial diversity, social isolation and severed community ties were mentioned by several PHA administrators as impediments to opportunity moves. More specifically, the underlying definition of what constituted an opportunity area was critiqued as being “nestled in sort of a perspective of white privilege” by one PHA administrator. From

this perspective, opportunity areas were defined narrowly as places with high: incomes, employment levels, school performance and other physical attributes. In the context of SAFMRs, these attributes were distilled down to a single characteristic, higher rents. The shortcoming of this approach was that it was divorced from the racial and social context that contributed to many barriers to mobility that voucher holders face. As a result, much of the burden and social costs associated with making opportunity moves continued to be on the shoulders of the voucher holders themselves. This was particularly problematic, as the implementation of the SAFMR rule focused on targeting families of color for moves to opportunity areas, while racial considerations were largely divorced from how those areas were identified.

Conclusions and recommendations

Implementation-related barriers to opportunity moves

The results from this analysis focus on two thematic issues: implementation-related barriers to opportunity moves and dissonance between the assumptions of the SAFMR rule and PHA administrators' perceptions of local opportunity structures. The discussion of these issues illuminates areas where the SAMFR rule can be amended to improve outcomes for HCV holders. Several of the implementation-related barriers highlight the need for ancillary programs that can be linked to the use of SAFMRs in the setting of payment standards. These programs would bridge the gap between tenants' ability to afford rents and other costs associated with MTO areas. A good example of the need for ancillary programs is related to transportation. Moves to opportunity areas can entail added transportation costs for voucher holders because of longer commutes and limited availability of public transit. Allowances for transportation assistance should be added to voucher holders' subsidies to facilitate opportunity moves. Likewise, voucher holders often require assistance in their housing searches. PHAs that are mandated to use SAFMRs should receive augmented resources for mobility counseling and guidance from HUD on best practices. Similarly, many voucher households received social services and income assistance from other agencies. PHAs that are mandated to use SAFMRs should receive augmented resources to coordinate wraparound services for tenants to ensure that opportunity moves will not disrupt tenant access to them.

Another implementation-related barrier to opportunity moves is the frequency that SAFMRs are calculated and published by HUD. PHA administrators identified a need for more frequent updates of SAFMRs to ensure that published data kept up with rents in real time. One option would be for HUD to move to a bi-annual or quarterly update of SAFMRs, to allow payment standards to keep up with rents. Another option would be for HUD to increase the ceiling for payment standards in opportunity areas. This would allow PHAs to exceed the 110% cap on payment standards in these areas without having to conduct rent studies and apply to HUD for a payment standard exception.

An added barrier to opportunity moves is the scarcity of affordable units in opportunity areas. There is a need to site new affordable housing in opportunity areas to create sufficient housing stock so that opportunity moves are possible. Internally, HUD should realign its existing programs and prioritize new development in opportunity areas. This is particularly important in relation to the siting of multi-unit housing for families. Although funding for new housing is not exclusively passed through HUD (e.g. the low-income housing tax credit – LIHTC – and other state funded programs are funded through other agencies), prioritizing affordable housing development in opportunity areas and requiring that developers accept HCVs should be more pronounced in the project review process.

The PHA administrators' discussions of dissonance between the assumptions of the SAFMR rule and their perceptions of local opportunity structures reveal additional areas where the SAFMR rule can be amended. The PHA administrators described how they focused on leasing up tenants where they are, then planning for opportunity moves in the future. This was done in response to tenants' requirements to use vouchers within a set time frame or lose them. Often, housing searches in opportunity areas were longer, and new voucher holders needed to participate in orientations about the benefits of opportunity moves. HUD needs to consider two amendments to its policies. First, HUD should consider allowing for longer searches for housing in opportunity areas. Additionally, HUD should require existing voucher holders to receive educational material and other information about opportunity moves as part of their voucher recertification process. This type of counseling and the provision of educational materials about opportunity moves are often required of new voucher holders. This added requirement for existing voucher holders would be prudent, as a voucher holder's second move is often the so-called opportunity move.

The PHA administrators also discussed the dissonance between the SAFMR rule's general application and the emphasis they placed on targeting families for opportunity moves. The SAFMR rule needs to address this issue more directly, as it is central to the development of ancillary programs. Although SAFMRs may have a general application to all voucher holders, there is a need for ancillary programs to be targeted toward specific constituencies within the HCV program, like families with children, more intentionally. This speaks to the need for more comprehensive and universal mobility counseling for families in the HCV program. This barrier to opportunity moves was a recurrent theme identified by the PHA administrators.

Finally, the PHA administrators discussed the incongruence between efforts to identify opportunity areas in conjunction with the SAFMR rule and the consideration of race while contextualizing what constitutes an opportunity move. They perceived that voucher holders had reservations about making opportunity moves because of the costs of severing social and institutional ties associated with such moves. This was particularly pronounced in their perceptions of the tradeoffs associated with opportunity moves for children. Moving to an opportunity area may give children access to a high performing public school, but at the cost of being racially isolated, and no longer exposed to black and brown peers or role models. It is noteworthy that these perceptions were not drawn from empirical research. Instead, the PHA administrators based these perceptions and subsequent decisions about program implementation on antidotal information and popular stereotypes about minority households. Policymakers should be mindful that street-level bureaucrats, like the PHA administrators that implement the HCV program, and not versed in the academic literature and empirical evidence that informs the policy formulation process. This should be considered when rationales for new policies and definitions of core goals of those policies are communicated to professionals in the field responsible for implementation.

Notwithstanding, the impasse between the evidence-based data that informs policymaking and the reliance of street-level bureaucrats on field experiences and antidotal information to inform policy implementation needs to be bridged. Our findings suggest that absent clear policy language related to how tenant experiences with racial discrimination fits into the SAFMR rule and the HCV program more broadly; PHA administrators' fell back on field experiences and antidotal information when designing implementation strategies. In the case of designing policies to address racial discrimination, this dilemma suggests that a broader definition of an opportunity area should be adopted by HUD that takes the racial composition of voucher holders and social institutions into consideration. In short, local

PHAs need more evidence-based policy guidance when identifying opportunity areas and applying program resources.

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Notes

1. For a more detailed description of how payment standards are set in high and low opportunity ZIP codes under the SAFMR rule, see the discussion in [Patterson and Silverman \(2019\)](#).
2. The administrators who participated in the study were all directors of PHAs or senior staff responsible for designing and supervising HCV implementation strategies.
3. There is extensive literature on outcomes of opportunity moves and debate about the benefits of deconcentrating HCVs. This topic is discussed from multiple perspectives in a recent forum published in *Housing Policy Debate* ([Galster, 2023](#)), where ([Imbroscio's, 2023](#)) critique of strategies based on opportunity moves is discussed in commentaries by five other housing scholars. This article acknowledges the richness of this debate and the scope of its impact on scholarship and policymaking. However, we argue that it is not highly salient to the day-to-day, applied work done by street-level bureaucrats who oversee the implementation of the HCV program. Their daily work takes place at a more micro-level without referencing empirical research on outcomes from opportunity moves. Instead, they are tasked with implementing programs handed to them by policymakers that grow out of macro-level debates, which they apply their own perceptions about voucher recipients to while adapting to conditions they experience in the field during the implementation process.
4. Under the rules of the Section 8 certificate program, vouchers could only be used in the municipal boundaries of the PHA that issued them. This constraint led to the clustering of vouchers in geographic areas where poverty concentrated, particularly when vouchers were issued by large PHAs in core cities. The Section 8 voucher demonstration program was designed to encourage the dispersal of vouchers metropolitan-wide and deconcentrate poverty. Reforms also allowed voucher holders were also allowed to port their vouchers to other metropolitan areas.
5. It is noteworthy that the HCV program is the largest rental assistance program in the USA. In 2022, Congress authorized approximately \$29bn to it. According to HUD's picture of subsidized households database, the program subsidized approximately 2.67 million households and private rental units in 2022. This represented more than half of all the affordable housing units subsidized by the federal government across the eight programs reported in the database.
6. These conclusions correspond with parallel research examining housing mobility outcomes outside of the USA ([Baker et al., 2016](#)). This highlights the degree to which the embeddedness of neoliberal imperatives in housing policies shapes outcomes in a more generalized manner across peripheries in the global context.
7. In their analysis of the housing mobility policies that grew out of the Mount Laurel affordable housing decisions in New Jersey, ([Massey et al., 2013](#)) came to similar conclusions about the need for wraparound services in addition to housing mobility counseling. This conclusion was also reached by ([Brisson, 2018](#)) in his discussion of the need to include services with subsidized housing in areas of concentrated disadvantage.
8. In 2018, 181 PHAs administered the HCV program in the 24 metropolitan areas where SAFMRs were mandated. Of those PHAs, nine were part of the MTW demonstration program and exempt from the SAFMR rule. The 24 metropolitan areas where SAFMRs were mandated included: Atlanta-Sandy Springs-Roswell, GA; Bergen-Passaic, NJ; Charlotte-Concord-Gastonia, NC-SC; Chicago-Joliet-Naperville, IL; Colorado Springs, CO; Dallas, TX; Fort

Lauderdale, FL; Fort Worth-Arlington, TX; Gary, IN; Hartford-West Hartford-East Hartford, CT; Jackson, MS; Jacksonville, FL; Monmouth-Ocean, NJ; North Port-Sarasota-Bradenton, FL; Palm Bay-Melbourne-Titusville, FL; Philadelphia-Camden-Wilmington, PA-NJ-DE-MD; Pittsburgh, PA; Sacramento-Roseville-Arden-Arcade, CA; San Antonio-New Braunfels, TX; San Diego-Carlsbad, CA; Tampa-St. Petersburg-Clearwater, FL; Urban Honolulu, HI; Washington-Arlington-Alexandria, DC-VA-MD; and West Palm Beach-Boca Raton, FL.

9. The nine exempted PHAs included the Atlanta Housing Authority, Charlotte Housing Authority, Chicago Housing Authority, District of Columbia Housing Authority, Fairfax County Redevelopment and Housing Authority, Philadelphia Housing Authority, Housing Authority of Pittsburgh, San Antonio Housing Authority and the San Diego Housing Commission.

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