The Impact of
Source of Income Laws on Voucher
Utilization and Locational Outcomes

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U.S. Department of Housing and Urban Development
Office of Policy Development and Research

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Utilization and Locational Outcomes

Prepared for
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EXECUTIVE SUMMARY

Housing vouchers were initially championed as a more efficient way of subsidizing housing for the poor and more suitable for a nation whose primary housing problem is one of affordability(Lowry 1971). More recently, vouchers have come to be seen as a tool for promoting economic and racial/ethnic integration (McClure 2008). Because vouchers augment the purchasing power of tenants a more expansive set of geographic options should be available. Indeed, when the Housing Choice Voucher program was enacted, improving the neighborhood outcomes of voucher recipients was a stated goal.

The advantages of vouchers vis-à-vis project based housing assistance is dependent upon voucher recipients being able to locate a landlord who will accept the voucher. For a number of reasons, this is not always the case. Some landlords wish to avoid the administrative burden associated with the voucher program. Other landlords resist renting to voucher recipients perhaps because they perceive this group to be undesirable tenants and/or fear their other tenants would object to voucher recipients as neighbors (Sard 2001). This type of discrimination based on the source of income could prevent the voucher program from living up to its full potential.

Indeed, various evaluations of the voucher program have found that at least 20% of all housing searches using a voucher are unsuccessful (Finkel and Buron 2001). Furthermore, many Local Housing Authorities fail to utilize all of their vouchers in a given year (Finkel, Khadduri et al. 2003). Discrimination based on source of income could be a contributing factor to some of the difficulties voucher recipients encounter when attempting to use a voucher.

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Discrimination based on source of income might not only be an obstacle to using a voucher but might also lead to voucher recipients being more clustered in disadvantaged neighborhoods. While vouchers do deliver better locational outcomes than project based housing assistance (Newman and Schnare 1997), there is both anecdotal and systematic evidence that indicates many voucher recipients are concentrating in disadvantaged neighborhoods (Pendall 2000). Voucher recipients might locate in disadvantaged neighborhoods for a number of reasons. It seems plausible, however, that discrimination against voucher recipients based on their source of income would play a significant role in limiting the neighborhood options of voucher recipients. In localities where discrimination occurs, voucher recipients might find their options more constrained and hence be relegated to more disadvantaged neighborhoods. Thus, discrimination against voucher recipients on the basis of their source of income might limit the success of the voucher program by lowering utilization rates (the *utilization rate* as used hereafter is defined as the number of leased units divided by the number of contracted units for the Annual Contributions contract) among Local Housing Authorities (LHAs) and increasing the likelihood that voucher recipients reside in more disadvantaged neighborhoods.

One possible policy antidote to discrimination against voucher recipients and the resulting problems this discrimination creates are Source of Income (SOI) anti-discrimination laws (hereafter referred to as SOI laws). These SOI laws make it illegal for landlords to discriminate against voucher recipients solely on the basis of their having a voucher. A number of state and local jurisdictions have passed such laws (Tegeler 2005). The existence of SOI laws might make it easier for voucher recipients to lease apartments, thereby increasing the utilization rates of LHAs in jurisdictions that have such laws and serve to open up a wider set of geographic options to voucher recipients, thereby improving their

locational outcomes.

The research presented in this report tests these two hypotheses, (1) SOI laws increase utilization rates among LHAs, and, (2) that SOI laws improve locational outcomes for voucher recipients (i.e. facilitates voucher recipients living in more advantaged neighborhoods). Using a difference-in-differences approach utilization rates among LHAs in jurisdictions with SOI laws were compared to utilization rates among LHAs in jurisdictions without SOI laws before and after the passage/repeal of the SOI laws. LHAs in jurisdictions that had a SOI law during the 1995-2008 study period were matched with LHAs in adjacent jurisdictions that did not have such laws. Three states, the District of Columbia, five cities and two counties saw the status of their SOI law change during the study period and had adjacent jurisdictions with LHAs that could be included in the analysis. A similar analytical approach was employed to examine SOI laws and the locational outcomes of voucher recipients including tract level measures of the poverty rate, percent white, and percent of the tract who are voucher recipients. These neighborhood characteristics were contrasted between voucher recipients residing in jurisdictions with SOI laws and voucher recipients residing in adjacent jurisdictions without SOI laws before and after the SOI law was passed/repealed. Voucher recipients residing in the jurisdictions described above were included in the analysis.

Among the findings, when utilization rates among LHAs in jurisdictions with SOI laws were compared to utilization rates in jurisdictions without such laws, both during the period when the laws were in effect and during the period when the laws were not in effect it was found that utilization rates increased in the LHAs when SOI laws were present. Improvements in utilization rates ranged from four percentage points to 11 percentage

points. This evidence is consistent with the notion that SOI laws facilitate the utilization of housing vouchers.

When the locational outcomes of voucher recipients living in jurisdictions with SOI laws was compared to the locational outcomes of voucher recipients living in jurisdictions without such laws, both during the period when the laws were in effect and during the period when the laws were not in effect the evidence suggests the neighborhoods of the former group were more advantaged. There were statistically significant differences across all three locational outcomes. That is, poverty rates and voucher concentrations were lower and the percent white was higher. But the differences were not that great. The poverty rate was one percentage point lower in the tracts of voucher recipients living in jurisdictions with SOI laws while these laws were in effect. The tract level measures of the percent white and percent who are voucher recipients differed by only half a percentage point between voucher recipients living in jurisdictions with SOI laws and voucher recipients living in jurisdictions without such laws during the period when the laws were in effect.

Stratified analyses that focused on the elderly and large families, two groups who have been found to be relatively unsuccessful using the voucher program, found the improvements in locational outcomes to be larger, albeit inconsistently so, for these groups. For large families there was a two percentage point decline in the percent of voucher recipients in a tract associated with the presence of a SOI law. For the elderly there was a one percentage point lower poverty rate and a three percentage point higher percent white in the tracts of voucher recipients who lived in jurisdictions with SOI laws while these laws were in effect. This evidence also suggests SOI law do facilitate movement into more advantaged neighborhoods.

Stratified analyses for blacks and Hispanics were more mixed. Blacks residing in jurisdictions with SOI laws while these laws were in effect experienced tract level poverty rates one percentage point lower than blacks living in jurisdictions without SOI laws. Hispanics residing in jurisdictions with SOI laws while these laws were in effect lived in tracts with one percentage point fewer whites than Hispanics living in jurisdictions without SOI laws. This is the one instance where the relationship was opposite of what was hypothesized. The other observed relationships for blacks and Hispanics were either not statistically significant and/or not large enough to be substantively meaningful.

For policy makers several lessons can be distilled from this research. SOI laws do appear to have the potential to make a substantial difference in utilization rates and locational outcomes, the latter under certain circumstances. As was mentioned earlier the improvements in utilization rates ranged from four percentage points to 11 percentage points. In a LHA with 10,000 vouchers this could translate into 400 to 1,100 additional families receiving assistance. The evidence for locational outcomes was more mixed. While in general there was evidence of SOI laws being associated with access to more advantaged neighborhoods the increases were not dramatic nor was the benefit of SOI laws apparent for all groups. Nevertheless, because expanding the range of neighborhoods available to voucher recipients is in vogue, even the modest benefits associated with SOI laws suggests an examination of whether these laws should be extended is warranted. This is especially the case if we consider the possibility that SOI laws be passed at the federal level. Such a law might be expected to have a more significant impact given the greater resources of the federal government for enforcement and the great visibility of federal laws.

Taken together, the results of this research suggest SOI can have an important impact on the performance of the Housing Choice Voucher program. In a world of limited

resources and a desperate need for more affordable housing, such a finding should not be

taken lightly.

CHAPTER ONE: INTRODUCTION

This report examines how Source of Income anti-discrimination laws (hereafter referred to as SOI laws) affect the use of housing vouchers. Vouchers are often championed as being more cost effective than project based housing assistance and in recent times have been lauded for their potential to deconcentrate poverty. The success of voucher programs, however, is predicated on voucher recipients successfully finding an apartment to lease. For a number of reasons, including discrimination by landlords on the basis of source of income (i.e. a voucher), voucher recipients frequently cannot find apartments to lease. In these instances the superiority of the voucher program to other types of housing assistance is illusory. SOI laws have the potential to dampen discrimination against voucher recipients and consequently could affect the success of the program. The research presented in this report assesses whether SOI laws do indeed achieve this potential.

Background

After years of debate a near consensus has been achieved on the superiority of vouchers over production subsidies as a means of meeting the nation's affordable housing needs (Winnick 1995). Housing vouchers were initially championed because of their greater cost-effectiveness, because vouchers more directly addressed the major housing problem of the poor, lack of income, and because vouchers provided families with more choices than project based assistance like public housing (Lowry 1971). More recently, vouchers have increasingly come to be seen as a means of promoting geographic opportunity (Newman and Schnare 1997; Goering 2005; McClure 2010). Because voucher recipients can, in theory, move anywhere to find a suitable unit, their housing choices are expected to be more expansive than those associated with project based housing assistance, which by definition creates some clustering of low-income households. Indeed, more recent legislation

authorizing tenant-based housing assistance explicitly promotes mixed income

neighborhoods as a goal (Government 1995). Moreover, the stigma associated with project-

based housing assistance often leads to these developments being targeted to low-income

minority neighborhoods (Rohe and Freeman 2001; Freeman 2003). Thus, tenant based

vouchers have come to be viewed as a way to promote opportunity as well as the most cost

effective means of providing affordable housing.

The superiority of housing vouchers is, of course, predicated on the recipients being

able to secure housing using a voucher. If a recipient is not able to secure housing with their

voucher, all of the putative advantages of vouchers will remain in the realm of theory. Since

vouchers first became a substantial component of the discourse on housing policy in the

1960s, there was significant concern about how successful voucher recipients would be in

successfully leasing an apartment. Reflecting the prevalence of poor housing quality as a

housing problem during those times, much of the early concern around successful voucher

use centered on the perceived obstacles recipients would face in finding housing that would

meet program standards. Because slums (defined here as physically inadequate housing)

were still prevalent in the 1960s, voucher proponents were concerned that government

funds would be used to subsidize substandard housing (Housing 1968). The first voucher

program, Section 8, was therefore implemented with minimum housing standards that

precluded using vouchers to lease substandard housing units.

In the Experimental Housing Allowance Programs (EHAP) voucher recipients (the

benefits in these experimental programs were called allowances but are referred to as

vouchers here for the sake of consistency) often failed to participate in the program, either

because their current unit did not meet program standards and they could/would not find

units that did. On average, 72% of recipients in EHAP successfully leased units that met

program standards (Frieden 1980, p. 247). Early studies of the Section 8 program also suggest that successfully leasing a unit with a voucher was by no means a guarantee. Success rates were 72% for non-minorities and 52% among minorities (Housing 1982). The difficulty of finding apartments that met quality standards and housing discrimination against minorities were posited by Weicher (1990, p.276) as reasons for the lack of success.

Subsequent studies of housing voucher success rates showed a general upward trend, but overall rates hovered between 68% and 81% during the 1980s and 1990s (Finkel and Buron 2001). The most recent study of voucher success rates found an average of 69% in metropolitan areas (Finkel and Buron 2001). Studies of voucher utilization, which considers whether a particular voucher is ultimately used by any family, paint a similar story. Housing authorities may issue a voucher multiple times, but ultimately the various recipients may not be able to secure a unit to lease. Utilization rates (the *utilization rate* as used hereafter is defined as the number of leased units divided by the number of contracted units for the Annual Contributions contract) under 90% are not uncommon among housing authorities (Finkel, Khadduri et al. 2003). Clearly, possession of a voucher by no means translates into successfully securing a unit to lease, and not all vouchers are ultimately used.

A number of factors have been found to be associated with successful voucher use. At the housing market level the aggressiveness of the Local Housing Authority (LHA) in identifying potential landlords, the management capabilities of the LHA, the number of vouchers issued by the LHA, the tightness of the local housing market, and the physical quality of housing in the local housing market have been associated with voucher success. Family level factors are important as well with family size and composition being found to be consistently important(Finkel and Buron 2001) while a study focusing on participants in the Moving to Opportunity Experiment also found race/ethnicity, access to an automobile

and positive attitudes towards moving to be additional important predictors of successful use of a voucher (Shroder 2003). And at least one researcher anecdotally reported that discrimination against voucher recipients was a possible factor in the success or failure of voucher use (Sard 2001).

Beyond the aforementioned factors are the decisions of landlords to rent to voucher recipients. Either because of the administrative burden or the perceived attributes of voucher recipients, landlords sometimes decline to participate in the program (Sard 2001). Interviews with property owners support the view that administrative burdens might be an obstacle. Interviewees cited late rent payments by LHAs and having to deal with multiple LHAs, in some cases leading to confusion about differing regulations, as reasons to avoid the program (Manye and Crowley 1999). Discrimination against voucher recipients might occur if they are perceived by landlords as undesirable tenants and/or landlords fear that their other tenants would view voucher recipients as undesirable neighbors.

Figure 1, which illustrates some of the results of a casual perusal of real estate ads on Craigslist, makes clear that discrimination against voucher recipients does occur. The prevalence of such discrimination is unknown, but a survey by the National Low Income Housing Coalition found 8% of Section 8 administrators citing discrimination against voucher recipients as a reason for unsuccessful voucher use (Manye and Crowley 1999). Furthermore, when the Washington D.C. based advocacy group, the Equal Rights Center, contacted landlords and asked whether they accepted vouchers, approximately half said no or listed obstacles that would make it difficult for voucher recipients to rent a unit (Macdonnell 2005). We should also keep in mind that like recipients of other types of means tested public assistance programs, voucher recipients are stigmatized in the public imagination (Williamson 1974). This stigma is often amplified by sensationalized accounts

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of voucher households ruining neighborhoods (Husock 2003; Rosin 2008). The hostile reaction to the implementation of the MTO experiment, whereby Baltimore public housing residents received vouchers that would enable them to move to suburban Baltimore County, is evidence of the stigma attached by many to the voucher program (Goering 2003). Evidence of vouchers' unsavory reputation can even be found in the popular media. Rappers often rap about growing up or living in dangerous "Section 8" housing as a way of demonstrating their toughness and street credibility (Buck 2004; Scrappy 2006). Thus, both theory and anecdotal evidence suggest discrimination against voucher recipients could be significant.

Figure 1. Real Estate Ads from Craigslist

$1200 / 2br - Completely Redone (Cypress Hills)

Date: 2010-12-13, 5:36PM EST
Reply to: KandPrealty@gmail.com[Errors when replying to ads?]

2-Bdrms, Eik, Living room, Full Bath
Talk 347-674-RENT (7368)
Visit www.KandPrealty.com
PS. NOTE
NO SECTION 8 at this location

- Location: Cypress Hills
- it's NOT ok to contact this poster with services or other commercial interests
- Fee Disclosure: Real Estate FEE, Rent, Security
- Listed By: KPRS

PostingID: 2111264998

$1200 / 1br - 1 bdrm apt. for rent (hempstead n.y.)

(map)

Date: 2010-12-12, 4:11PM EST
Reply to: see below

Spacious 1 bdrm apt. for rent. Full bath, lrg living area, kitchen with dishwshr, laundry room and parking(optional). Located at 32 cathedral ave on garden city- hempstead border, close to all. No section 8 allowed. Contact chris at 516-376-7105.

cathedral ave at hempstead turnpike ([google map](#)) ([yahoo map](#))

- cats are OK - purrr
- Location: hempstead n.y.
- it's NOT ok to contact this poster with services or other commercial interests
- Fee Disclosure: none
- Listed By: christopher pesa

Discrimination against voucher recipients could affect the success of the voucher program in several ways. Most obviously, the success with which vouchers are used might be compromised. Indeed, Finkel and Buron (2001) found that voucher recipients were more likely to be successful leasing a unit if they lived in a jurisdiction with a SOI law. The Finkel and Buron (2001) study, however, relied on cross-sectional data that makes it difficult to know if the SOI laws preceded greater voucher recipient success or vice versa. Additionally, some of the secondary benefits of voucher use, such as fostering mobility into more advantaged neighborhoods, might also be less likely due to discrimination.

Given the on-going need for housing subsidies, that vouchers are the nation's largest affordable housing program and the recognition that discrimination against voucher recipients may be inhibiting the successful use of vouchers, it is not surprising that some advocates have looked for policy remedies to address discrimination (Macdonnell 2005;Tegeler, Cunningham et al. 2005). One such policy remedy is SOI laws. These laws typically forbid discrimination in access to housing or employment on the basis of the source

of income (e.g. welfare assistance, housing vouchers). For SOI laws to be an effective remedy they would have to indeed deter discrimination. The evidence on the effectiveness of anti-discrimination laws with regard to housing outcomes suggests such laws do have an effect. For example, state fair housing laws were found to moderately impact housing outcomes for blacks renters (Collins 2004), researchers demonstrated a positive relationship between fair housing policy enforcement and black homeownership growth (Bostic and Martin 2005), and anti-predatory lending laws appear to affect the type and volume of subprime lending (Bostic, Engel et al. 2008). Moreover, several demographers have linked lower levels of segregation in newer metropolitan areas to the fact that much of the housing built in these areas was built after the passage of federal fair housing laws (Massey and Denton 1993; Logan, Stults et al. 2004). It is therefore plausible that SOI laws, too, might have an effect on housing outcomes for voucher recipients.

The remainder of this report focuses on the empirical question of whether or not SOI laws have an impact on outcomes associated with the voucher program. The next chapter examines the relationship between LHA utilization rates and the existence of a SOI law in the LHA's jurisdiction. As mentioned above, SOI laws have the potential to make voucher use easier because landlords will have a disincentive to discriminate on the basis of the source of income (i.e. the voucher). This would result in higher utilization rates, all things being equal. The subsequent chapter addresses another outcome of interest to many—locational outcomes. Frequently, the potential to expand the neighborhood options of the poor is offered as a major selling point of the voucher program (Sard 2001; Polikoff 2005). Chapter three examines whether SOI laws indeed facilitate entry into more advantaged neighborhoods. The final chapter summarizes the findings and discusses the implications for future research and policy.

CHAPTER TWO: SOI LAWS AND UTILIZATION RATES

The overview provided in Chapter one discussed the numerous reasons why vouchers might not be used successfully and described the research documenting that indeed, vouchers are often unable to be used successfully. When a recipient returns a voucher because of an unsuccessful search, the LHA has the option, time permitting, to reissue the voucher to another family. Successive families may also be unsuccessful in their searches, however, leading to a lower utilization rate. As discussed in the preceding chapter, it seems plausible that discrimination by landlords could contribute to unsuccessful searches by voucher recipients and therefore lower utilization rates. Conversely, to the extent that SOI laws dampen discrimination against voucher recipients, this could lead to higher utilization rates. This chapter explores the hypothesis of whether SOI laws are associated with higher utilization rates.

Data for Utilization Analysis

Data for the utilization analysis was drawn from two sources. 1) Utilization rates have been obtained from the U.S. Department of Housing and Urban Development (HUD) for the years 1995-2008. 2) The Poverty and Race Research Action Council's (PRRAC) database of State, Local, and Federal Statutes against Source-of-Income Discrimination (2005) was used to identify cities or counties that have SOI laws. A list of state and local SOI laws (Table A1), an outline of the methodology PRRAC used to canvass state and local SOI laws (Table A2), a map of states with SOI laws (Figure A1), and a map of localities (Figure A2) with SOI laws is provided in the appendix.

Analytic Strategy for Assessing Impacts on Utilization Rates

To detect whether SOI laws have an impact on utilization rates, a difference-in-differences analysis was used (Meyer 1995). This approach compares utilization rates of

LHAs in jurisdictions having SOI laws with utilization rates of LHAs in jurisdictions without such laws before *and* after a change in presence of SOI laws (meaning the SOI law was adopted or repealed).

SOI laws have been adopted at the city, county, and state levels. To employ the difference-in-differences approach, the SOI law must have either been adopted or repealed during the years for which utilization data are available. The only states that adopted SOI laws during the study period (1995-2008) are New Jersey and Washington D.C. (which is being treated as a state for the purposes of this analysis). Also, Minnesota and Oregon's SOI laws were effectively repealed during the study period. The LHAs in these states can also be included in the difference-in-differences analysis. The comparison in these latter two cases is between utilization rates of LHAs in jurisdictions having SOI laws with utilization rates of LHAs in jurisdictions without such laws before *and* after the repealing of the SOI laws. Several cities and counties also adopted SOI laws during the study period. These jurisdictions include the cities of Los Angeles and San Francisco (CA), Buffalo and New York (NY), and Grand Rapids (MI) as well as Frederick (MD) and Nassau (NY) counties[1].

To increase the comparability of the treatment and control groups, the comparisons will be limited to those LHAs that are in jurisdictions that abut the boundary of a jurisdiction with the opposite SOI status. Thus, LHAs in jurisdictions with SOI laws (the "treatment group") will be compared to LHAs in adjacent jurisdictions without SOI laws (the "control group"). Because data are available for several years (1995-2008 for most LHAs) and a number of LHAs are to be included in the study, the unit of analysis is the LHA-year. The outcome of interest is the utilization rate for a specific LHA in a specific year.

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1 A number of other localities adopted SOI laws were excluded from the analysis because they either had no LHAs within their border or did not have any neighboring jurisdictions with LHAs.

For each of the states whose SOI law status changed (New Jersey, Washington D.C., Minnesota and Oregon), "treatment" LHAs were selected if they were in a county on the border of the state and there were LHAs in an adjacent county without a SOI law across the state boundary which were selected for the "control" group. For each of the cities or counties whose SOI law status changed during the study period, all of the LHAs within these jurisdictions were selected as treatment LHAs. For the cities of Buffalo, Grand Rapids and Los Angeles, control LHAs were selected from the counties that surround these cities. For Nassau and Frederick Counties, control LHAs were selected from adjacent counties that do not have SOI laws. Finally, for the cities of New York and San Francisco, which encompass counties, control LHAs were selected from adjoining counties without SOI laws. New York City's SOI law was only passed in 2008, the year our study period ends. Consequently, the analyses will experiment with excluding the New York City observations, as there may not have been enough time for the law to take effect.

By selecting LHAs in adjacent cities or counties, we limit the possibility of confounding factors that might arise if the comparison group had vastly different housing market characteristics. A total of 47 LHAs are in jurisdictions that adopted or repealed SOI laws and are in counties on the borders of states and/or are in cities. Another 87 LHAs are in jurisdictions that do not have SOI laws, but are adjacent to states, counties, or cities with SOI laws. The total sample for the difference-in-difference analyses using geographically proximate treatments and controls consists of 1,801 observations. The list of LHAs in the analyses of utilization rates is in Table A3 in the appendix.

Limiting the analysis to LHAs that are in adjacent jurisdictions serves the purpose of dampening the impact of omitted variables that may be correlated with whether a jurisdiction's SOI law status changed. If the omitted variables correlate with the change in

the status of SOI laws, the estimate of the effect of these laws on utilization rates will be biased. Using the aforementioned approach, the differences in how utilization rates are affected by the differences in the independent variable, namely the presence of a SOI law, can be estimated. The bias in this case will exist to the extent that differences in omitted variables correlate with whether or not the status of a SOI law has changed. Because control LHAs were selected from the same geographic area, many of the omitted variables are likely to take on similar values between the treatment and control cases. Of course, even with this approach some of the differences in the values of the omitted variables between the treatment and control LHAs may correlate with whether or not a SOI law has been adopted. If the correlation between the omitted variables and the adoption of the SOI laws is less after matching than before, assuming matching will produce preferable results does not seem unreasonable. Cities or counties that are adjacent will likely share similar unmeasured housing market traits, perception of voucher recipients, and other relevant unmeasured traits than would randomly matched pairs. Goff, Lebedinsky and Lile (2009) showed that matching states based on geographic proximity produces better estimates of the factors that promote economic growth. The equation below models the difference-in-differences approach that will be used to estimate the relationship between the adoption of SOI laws and utilization rates.

$UTIL_i = a_0 + b_1 SOI_i + b_2 SOIPERIOD_i + b_3 SOI_i * SOIPERIOD_i +$
$b_3 COMPARISONGROUP_i + u_i$,

Where

a_0 = An intercept

$UTIL_i$ = the utilization rate for each LHA

SOI_i = A dummy variable indicating whether the LHA is in a jurisdiction that adopted or repealed a SOI law during the study period

$SOIPERIOD_i$ = A dummy variable indicating if the year is after the adoption/repeal of a SOI law in that jurisdiction and the adjacent jurisdiction

$SOI_i * SOIPERIOD_i$ = an interaction term between the two variables defined above

$COMPARISONGROUP_i$ = A dummy variable indicating which comparison group (e.g. treatment and control LHAs for the City of Los Angles) belongs to

u_i = is an error term

Table 1 provides descriptive statistics for the utilization rate analysis. The unit of analysis in this model is the LHA. The interaction term in the above equation will reveal if the difference in utilization rates between LHAs in SOI jurisdictions and LHAs in jurisdictions without SOI laws changed after the adoption or repealing of a SOI law. If this interaction term is statistically significant and substantively meaningful, it will provide compelling evidence that SOI laws do indeed affect utilization rates. Such a finding would show that the difference in utilization rates between LHAs in jurisdictions with and without SOI laws changed after the adoption or repealing of SOI laws. If SOI laws are making discrimination against voucher recipients less likely, and subsequently increasing recipients' success rate, the change in SOI laws would certainly seem to be the most plausible explanation for this dynamic.

Table 1. Descriptive Statistics for Utilization Analysis

	Observations	Mean	Standard Deviation	Min	Max
Utilization Rate	1810	90.91	24.29	0.00	915.80
	Frequency=0		Frequency=1		
Number of observations after SOI enacted	1011		804		
Number of observations in jurisdictions that adopted SOI laws	1176		639		

Results of Difference-in-Differences Analysis of Utilization Rates

The relationship between LHA utilization rates and enactment of SOI laws is discussed in this section. Recall that a difference-in-differences approach was employed examining whether the difference between utilization rates before and after the enactment of SOI laws changes. Table 2 illustrates the results of a model estimated using ordinary least squares (OLS) with robust standard errors to account for having multiple observations from the same LHA. The second column presents results for the entire sample, while the third column excludes New York City LHAs and its comparison LHAs. Because New York adopted a SOI only in 2008, it can reasonably be argued that there were not enough observations in the period when the SOI law was in effect to have an impact on the utilization rates of New York City LHAs.

Table 2. Relationship Between Utilization Rates and SOI Laws Using Robust Standard Errors

Variable	Parameter Estimate Entire Sample	Parameter Estimate Excluding New York
Number of years since 1995	-0.08	-0.01
	(0.16)	(0.17)
SOI law in Effect	-0.06	-0.85
	(1.58)	(1.66)
In a Jurisdiction that adopted	-2.03	-3.28

Table 2. Relationship Between Utilization Rates and SOI Laws Using Robust Standard Errors

Variable	Parameter Estimate	Parameter Estimate
SOI		
	(2.25)	(2.45)
Difference between SOI jurisdiction and Control while SOI law was in effect	6.26	7.45*
	(4.09)	(4.21)
Constant	94.82**	94.94**
	(2.89)	(2.97)
Observations	1681	1492
R-squared	0.02	0.02

Model estimated using OLS with robust standard errors in parentheses
Unit of analysis: Local Housing Authorities
*significant at 10%; **significant at 5%; *** significant at 1%
Note: In the interest of brevity coefficients for the fixed effect variables are not listed.

The variable "SOI law in Effect" represents the years when the SOI law was in effect in both the jurisdictions that passed the laws and their adjacent counterparts. The coefficient is not statistically significant in either column, suggesting there was no change in utilization rates across the board that accompanied the adoption of SOI laws. The variable, "In a Jurisdiction that adopted SOI law," indicates whether that observation belongs to a jurisdiction that had a SOI law during the study period. The coefficient is negative and not significant. This implies that if anything, utilization rates were lower in those jurisdictions that had SOI laws, but this result is not statistically significant. The variable "Difference between SOI jurisdiction and Control jurisdiction while SOI law was in effect" provides a direct test of whether differences in utilization rates between LHAs in SOI jurisdictions and those in adjacent non SOI jurisdictions changed after the passage or repeal of SOI laws. The coefficient for this variable in the second column is positive but not statistically significant. In the third column, which represents the relationships between utilization rates and SOI laws excluding New York City, the coefficient is positive and statistically significant. The result implies that after jurisdictions passed SOI laws there was a seven point increase in

utilization rates among LHAs in those jurisdictions, relative to LHAs in the adjacent

comparison jurisdictions. This suggests that after the passage of SOI laws, utilization rates

were higher in jurisdictions that adopted SOI laws. The model as a whole, however, does a

poor job of explaining the variation in utilization rates, as indicated by the low R^2 values.

Table 3 illustrates the results of a model estimated using ordinary least squares

(OLS) with fixed effects to account for having multiple observations from the same LHA.

In the interest of brevity, only the independent variables central to our hypothesis are

discussed. As in Table 2, the second column presents results for the entire sample, while the

third column excludes New York City LHAs and its comparison LHAs. The findings using

a fixed effects approach are similar to those using robust standard errors. The major

differences between the models are that the fixed effects approach explains more of the

variation in utilization rates, as evidenced by the higher R^2. The variable "Difference

between SOI jurisdiction and Control jurisdiction *after* SOI law passed" is also statistically

significant for both the entire sample and in the model excluding New York City. The result

implies that after jurisdictions passed SOI laws there was an 11 point increase in utilization

rates among LHAs in those jurisdictions, relative to LHAs in the adjacent comparison

jurisdictions.

Table 3. Relationship Between Utilization Rates and SOI Laws Using Fixed Effects		
	Entire Sample	New York and Comparison excluded
Variable	Parameter Estimate	Parameter Estimate
Number of years since 1995	-0.02 (0.18)	0.04 (0.20)
SOI law in Effect	-1.12 (2.03)	-1.69 (2.18)
In a Jurisdiction that adopted SOI	-28.25 (16.92)	-27.53 (27.34)
Difference between SOI jurisdiction and Control jurisdiction *after* SOI law passed	10.58**	11.12**

Table 3. Relationship Between Utilization Rates and SOI Laws Using Fixed Effects		
	Entire Sample	New York and Comparison excluded
Constant	(2.80) 94.94	(2.95) 87.42
Observations	1,492	1,492
R-squared	.02	.09

Model estimated using OLS with robust standard errors in parentheses
Unit of analysis: Local Housing Authorities
*significant at 10%; **significant at 5%; *** significant at 1%
Note: In the interest of brevity coefficients for the fixed effect variables are not listed.

An additional set of analyses, not presented here, were conducted excluding those observations that had large jumps in their utilization rates from the previous year. This was defined as an increase of at least 20% in the utilization rate over the previous year. Dropping these observations had the effect of making the relationship between the passage of SOI laws and the relative increase in utilization rates smaller. Dropping the observations with large changes in their utilization rates and estimating the model using robust standard errors, the relative increase in the utilization rate was still statistically significant but only by four points. This contrasts to a relative increase of seven points, as described above, when these observations were not dropped. When the model was estimated using fixed effects and excluded those observations with especially large increases in their utilization rates, the relative increase was again four points.

Taken together, the results presented here suggest that SOI laws do make a difference in utilization rates.

CHAPTER THREE: SOI LAWS AND LOCATIONAL OUTCOMES

Although not the primary motivation for the adoption of voucher program, the

notion that vouchers could facilitate movement to better neighborhoods has long been one

selling point of this type of housing subsidy (Sard 2001). Research based on EHAP found

that vouchers only had a modest impact on neighborhood quality, primarily because many

families did not move to use their vouchers. But among those that did move, neighborhood

quality did improve (Frieden 1980). Evaluations of later voucher programs, like Section 8

and the Housing Choice Voucher program, indicate tenant based vouchers do appear to be

promoting a "geography of opportunity" more so than project-based housing assistance

programs like public housing (Newman and Schnare 1997). Nevertheless, there is evidence

to suggest that vouchers are not expanding geographic choices as much as they could. For

example, Pendall (2000) found that although voucher and certificate holders were less likely

to live in distressed[2] tracts than poor renters, one in five voucher and certificate holders still

lived in distressed neighborhoods. Another study found there were many tracts with

housing affordable to voucher recipients, but that had relatively few voucher recipients living

there (Devine, Gray et al. 2003). More recently, McClure (2008) found that the proportion

of voucher recipients residing in low-poverty neighborhoods, defined as neighborhoods with

a poverty rate below 10%, was slightly lower than the proportion of units at or below Fair

Market Rents (FMR) in such neighborhoods. This would suggest that voucher recipients

were less dispersed than housing units they could afford. Moreover, the proportion of

extremely low-income households residing in low poverty tracts (25%) was slightly lower

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2 Distressed tracts were defined as those where a neighborhood was one standard deviation above the national
median on five indicators simultaneously: persons below the poverty line, percentage of households receiving
income from public assistance, percentage of males aged 16 and over who had worked fewer than 27 weeks in
1989, percentage of families with children under 18 headed by a single woman, and percentage of persons
between 16 and 19 who were not in school and had not completed high school.

than the proportion of voucher recipients residing in such tracts. This last finding would suggest that the spatial outcomes of very poor households compare favorably with those of voucher recipients. This belies the notion that vouchers expand geographic opportunity for the poor.

Discrimination against voucher recipients on the basis of their source of income is one explanation for the voucher program not achieving the expected degree of deconcentration of the poor. As Figure 1 in Chapter One illustrates discrimination against voucher holders does occur. Several prominent news reports have also described how voucher holders have been denied access to units because they have a voucher (Fernandez 2008; Spivack 2009). Moreover, some advocates of Source of Income SOI laws have pointed to SOI discrimination against voucher recipients as a potential cause of their undue concentration (Daniel 2010) in certain communities within jurisdictions without such laws. This argument assumes discriminatory treatment restricts the geographic options of voucher households. To the extent that landlords discriminate it seems likely that such discriminatory practices would not be randomly distributed across space. Rather, discriminatory practices might likely be found in those neighborhoods where non-voucher demand is strong and/or neighboring tenants and residents would react negatively to voucher households. This could result in an increase voucher recipients being segregated into fewer and most likely more disadvantaged neighborhoods.

Analytical Strategy for Analyzing SOI Laws and Locational Outcomes

To discern whether SOI laws are related to locational outcomes among voucher recipients, locational attainment models are employed. Locational attainment models are used most often by urban sociologists as a way of exploring how individual traits are translated into locational outcomes. Using this approach scholars have used locational

outcomes (e.g. residence in a suburb, neighborhood racial composition) as the dependent variable, while the independent variables of interest were individual traits such as race or class (Gross and Massey 1991; Alba and Logan 1993; Logan and Alba 1993; Logan, Alba et al. 1996; Freeman 2002; Freeman 2010). In the research presented here the dependent variables are neighborhood characteristics, as in other locational attainment research. But in this case we focus on whether a jurisdiction with a SOI law facilitates individual voucher recipients residing in more advantaged neighborhoods. Past research on locational attainment has considered spatial independent variables such as region or suburban location as determinants of locational outcomes (Logan, Alba et al. 1996; Friedman and Rosenbaum 2007; Freeman 2010). Analogously, SOI law status in a jurisdiction is used as an independent variable here.

Using the characteristics of the neighborhood the voucher recipient resides in as the dependent variable and residence in a jurisdiction with a SOI law as the key independent variable of interest still leaves the challenge of ruling out other explanations for any observed relationship between residence in a jurisdiction with a SOI law and the voucher recipient's locational outcomes. For example, in jurisdictions with SOI laws the populace, in general, and landlords, particularly, might be more open to having as neighbors and renting to, voucher recipients. Moreover, voucher recipients might choose to look for housing in jurisdictions with SOI laws because these jurisdictions are viewed as providing more options for the type of neighborhoods a voucher recipient can move into.

To dampen the extent to which these and other threats might undermine the validity of the findings, a difference-in-differences approach much like the one employed in Chapter two to study utilization rates is used. In this chapter, the locational outcomes of voucher recipients living in jurisdictions with SOI laws are compared to the locational outcomes of

voucher recipients living in jurisdictions without SOI laws before *and* after a change in the status of SOI laws (meaning the SOI law was adopted or repealed).

To increase the comparability of the treatment (i.e. voucher recipients living in jurisdictions without SOI laws) and control groups (voucher recipients living in jurisdictions where the status of SOI laws did not change), the comparisons will be limited to those voucher recipients living in jurisdictions that abut the boundary of a jurisdiction with the opposite SOI status. Thus, locational outcomes of voucher recipients living in jurisdictions with SOI laws will be compared to the locational outcomes of voucher recipients living in adjacent jurisdictions without SOI laws. The same jurisdictions that were used in the utilization rate analysis are used here. See Table A3 in the appendix for a list of the jurisdictions and corresponding LHAs. Because data are available for several years (1995-2008), the unit of analysis is the person-year. The outcomes of interest are the characteristics of the neighborhood the voucher recipient resides in for a specific year.

Limiting the analysis to voucher recipients that are in adjacent jurisdictions serves the purpose of dampening the impact of omitted variables that may be correlated with whether a jurisdiction's SOI law status changed. Because the voucher recipients in both treatment and control jurisdictions are observed before and after the change in SOI status any omitted variables that correlate with SOI status but do not change contemporaneously will not bias the estimates of the impact of SOI status on locational outcomes. For example, imagine that jurisdictions with more liberal attitudes have populations and landlords that are more receptive to the voucher program and therefore voucher recipients in these jurisdictions live in more advantaged neighborhoods. The liberal attitudes of these jurisdiction leads to the adoption of SOI laws. Because the difference-in-differences approach makes comparisons before and after the adoption of the SOI law, however, the liberal attitudes should affect

locational outcomes both before and after the adoption of the laws. Therefore, the fact that liberal attitudes are not explicitly measured for the analysis does not result in biased results.

The possibility of self-selection bias, whereby voucher recipients who wish to live in more advantaged neighborhoods gravitate towards jurisdictions with SOI laws, is also dampened to a great extent using the difference-in-differences approach. The passage of a SOI law might attract some voucher applicants who think such laws will facilitate their moving into better neighborhoods. But many LHAs have long waiting lists for vouchers and therefore the family would first have to move to the jurisdiction to get on the waiting list. This is possible, but seems unlikely. Waiting lists would likely deter moves motivated by the existence of SOI laws. Those voucher recipients who already have vouchers could in theory use portability to transfer their voucher to another jurisdiction. But unless SOI laws do indeed facilitate movement into more advantaged neighborhoods, such moves would not result in qualitatively different locational outcomes. If the attitudes and behaviors of voucher recipients who choose to move into jurisdictions with SOI laws lead to different locational outcomes, these attitudes and behaviors should have led to their residing in more advantaged neighborhoods before they moved to the jurisdictions with SOI laws. Consequently, the absence of specific measures for self-selection should not bias the results.

Locational outcomes were chosen to correspond with prevailing concerns among policy makers including the tract's poverty rate, racial composition, and ratio of voucher recipients to non-recipients residing in the tract. The poverty rate is of interest because access to lower poverty neighborhoods is thought to contribute to a higher quality of life (Khadduri 2001). The racial composition of the voucher recipient's tract is pertinent because racial segregation has been a defining feature of urban America and has often times been exacerbated by federal housing programs (Massey and Denton 1993). Finally, the

proportion of residents who also hold vouchers in the recipient's tract will give an indication of the extent to which there is a clustering of voucher recipients. The notion that voucher holders are clustering together is one that has captured the attention of both journalists and scholars alike (Briggs and Dreier 2008; Rosin 2008).

Data for Analysis of Locational Outcomes

The voucher data used in the study were obtained from HUD and are for the years 1995-2008. Because neighborhood level data from the census bureau is not available every year data from the 2000 census were used to measure locational outcomes for the years 1995-2003 and the 2005-2009 American Community Survey (ACS) data were used to measure locational outcomes for the years 2004-2008. The decennial census is a well-known source of data but use of the ACS deserves some comment.

The ACS replaced the long form of the decennial census. The ACS collects data from a sample of approximately 3 million addresses every year. Like the decennial census, ACS data are available at different levels of geography. Because the sample size of the ACS is relatively small, however, multi-year samples are necessary to produce reliable estimates for small units of geography like tracts. Consequently, the ACS estimates can be conceived of as average values over the 2005-2009 period (Bureau 2009). The results of the analyses presented in this chapter should not be biased by the use of two different data sets to measure locational outcomes because the two different data sources are used to measure locational outcomes for both voucher recipients in jurisdictions with SOI laws and voucher recipients in jurisdictions without such laws.

The equation below models the difference-in-differences approach that will be used to estimate the relationship between the adoption of SOI laws and locational outcomes.

$$\text{TRACTTRAIT}_i = a_0 + b_1\text{SOI}_i + b_2\text{SOIPERIOD}_i + b_3\text{SOI}_i * \text{SOIPERIOD}_i +$$

$$b_4\text{COMPARISONGROUP}_i + b_5\text{LHA}_i + + u_i ,$$

Where

a_0 = An intercept

TRACTTRAIT_i = the locational outcome of interest (i.e. tract poverty rate, tract percent white, proportion of tract who are voucher recipients)

SOI_i = A dummy variable indicating whether the voucher recipient lives in a jurisdiction that adopted or repealed a SOI law during the study period

SOIPERIOD_i = A dummy variable indicating if the year is after the adoption/repeal of a SOI law in that jurisdiction and the adjacent jurisdiction

$\text{SOI}_i * \text{SOIPERIOD}_i$ = an interaction term between the two variables defined above

COMPARISONGROUP_i = A dummy variable indicating which comparison group (e.g. treatment and control LHAs for the City of Los Angles) belongs to

LHA_i = A dummy variable indicating the LHA who issued the voucher.

u_i = is an error term

  Because the data is in person-year format, meaning each family contributes multiple records to the data set for each year they are observed, Huber-white robust standard errors are estimated to account for dependence among observations. To account for dependence

among voucher recipients who are clients of the same LHA and the same comparison group, fixed effects (i.e. a dummy variable representing each category) are used.

Table 4 provides descriptive statistics for the locational outcomes analysis. The interaction term in the above equation will reveal if the difference in locational outcomes between voucher recipients in SOI jurisdictions and voucher recipients in jurisdictions without SOI laws changed after the adoption or repealing of a SOI law. If this interaction term is statistically significant and substantively meaningful, it will provide compelling evidence that SOI laws do indeed affect locational outcomes for voucher recipients. Such a finding would show that the difference in locational outcomes between voucher recipients in jurisdictions with and without SOI laws changed after the adoption or repealing of SOI laws. If SOI laws are making discrimination against voucher recipients less likely, and subsequently increasing recipients' range of neighborhood options, the SOI laws would certainly seem to be the most plausible explanation for this dynamic.

Table 4. Descriptive Statistics for OLS Regression Analysis of Locational Outcomes					
Variable	Observations	Mean	Standard Deviation	Min	Max
Voucher Percent in Tract	142,730	.04	.04	0.00	.18
Percent White in Tract	142,730	.31	.33	0.00	1
Poverty Rate in Tract	142,730	.24	.14	0.00	1
Household Size	1189528	2.54	1.68	0.00	15
	Frequency	Percent		Percent	
Lives in Jurisdiction with SOI Law during study period	96,822	68.25%			
Black	69,451	48.95%			
Hispanic	30,128	21.24%			
Asian	3,866	2.72%			
Native American	610	0.43 %			
Elderly	30,859	21.75%			

Results: Difference-in-Differences Analysis of Locational Outcomes

Table 5 illustrates the results of regression models estimating the relationship between SOI laws and locational outcomes using a difference-in-differences approach. These models excluded New York City and adjacent jurisdictions from the analysis because as was described in Chapter two New York City's SOI law was only passed in 2008. The variable "SOI law in Effect" represents the years when the SOI law was in effect in the jurisdictions that passed SOI laws and for their adjacent counterparts the same period of time, although no SOI laws were in effect in these jurisdictions. The coefficient is statistically significant in the Percent White and Percent Voucher recipients columns, respectively. The result in the third column for percent white indicates that, on average, voucher recipients who lived in jurisdictions with SOI laws lived in tracts where the percentage white was one point lower. The result in the fourth column indicates voucher recipients who lived in jurisdictions with SOI laws lived in tracts where the percentage of voucher recipients was two percentage points higher. The variable, "In a Jurisdiction that adopted SOI law," is only statistically significant for the outcome Percent Voucher recipients. This variable indicates whether the voucher recipient lived in a jurisdiction that had a SOI law during the study period. The coefficient is significant and negative indicating the proportion of voucher recipients in these tracts was one percentage point lower than that found in jurisdictions that did not have SOI laws during the study period.

Table 5. Relationship Between SOI Laws and Locational Outcomes of Voucher Recipients			
		Locational Outcomes	
Independent Variables	Poverty Rate	Percent White	Percent Voucher Recipients
SOI law in Effect	0.00	-0.01***	0.02***
	(0.000)	(0.001)	(0.000)
In a Jurisdiction that adopted SOI	-0.01	-0.23	-0.01***
	(0.008)	(1.957)	(0.004)

Table 5. Relationship Between SOI Laws and Locational Outcomes of Voucher Recipients

Independent Variables	Poverty Rate	Locational Outcomes	
		Percent White	Percent Voucher Recipients
Difference between SOI jurisdiction and Control jurisdiction while SOI law was in effect	-0.01***	0.005***	-0.005***
	(0.000)	(0.001)	(0.000)
Constant	0.09***	0.97***	0.00***
	(0.031)	(0.000)	(0.000)
Observations	1,592,360	1,592,367	1,592,338
R-squared	0.440	0.700	0.432

Model estimated using OLS with robust standard errors in parentheses
Unit of analysis: Individual Voucher Recipients
*** p<0.01, ** p<0.05, * p<0.1

The variable "Difference between SOI jurisdiction and Control jurisdiction while *SOI* law was in effect" provides a direct test of whether differences in locational outcomes between voucher recipients in SOI jurisdictions and those in adjacent non SOI jurisdictions changed with the passage or repeal of SOI laws. For all three locational outcomes the variables are statistically significant and have the direction that suggests SOI laws enable voucher recipients to move to more advantaged neighborhoods. Column two shows that voucher recipients lived in tracts where the poverty rate was one percentage point lower during the time the SOI law was in effect if they lived in a jurisdiction with a SOI law. But the magnitude of the other relationships shown in columns three and four is even weaker. For the percent white and percent voucher recipients as outcomes the differences in respective neighborhood characteristics is approximately half a percentage point. Such a small difference would hardly seem to be of much consequence.

Stratified Analyses – To test whether the experiences of certain subsets of the voucher population differed from those described in the preceding paragraphs a set of stratified analyses were conducted for families with five or more members, the elderly, blacks and Hispanics. Stratified analyses were chosen because they are easier to interpret than three way interaction terms. Families with five or more members and the elderly were chosen as the foci of the stratified analyses because prior research suggests these groups often experience the greatest difficulty in terms of successfully using the voucher program (Finkel and Buron 2001, p. iii). Finkel and Buron also found male voucher recipients to have difficulty using their voucher, but they attributed this to a special program in New York City targeted at homeless men. Because New York City voucher recipients were not included in the analysis and there is no evidence that other cities had adopted such a program, stratified analyses were not conducted for males. Although racial/ethnic minorities have been found to have lower success rates this has been attributed to other factors such as the housing markets these groups were concentrated in Finkel and Buron 2001, p. iii). But black and Hispanic voucher recipients have been found to cluster in more disadvantaged neighborhoods (Devine, Gray et al. 2003). For that reason, stratified analyses for blacks and Hispanics were also included here.

Table Six illustrates the results of the stratified analyses for elderly families and those with at least five members. As before, the standard errors are adjusted to account for dependence among observations and fixed effects are used for the LHA that issued the voucher and to identify the comparison area. The models were estimated using OLS regression. For the purposes of brevity only the interaction term "Difference between SOI jurisdiction and Control jurisdiction while SOI law was in effect" is discussed. The top panel of Table six provides results for regression models estimated for voucher recipients with at

least five members in their family. Only the coefficient for the percent voucher recipients is both statistically significant and substantively meaningful. In the period when SOI laws were in effect, voucher recipients in large families who lived in jurisdictions with SOI laws resided in tracts where the proportion of voucher recipients was two percentage points lower than that found among voucher recipients in large families who lived in jurisdictions without SOI laws.

Table 6. Relationship Between SOI Laws and Locational Outcomes of Voucher Recipients Stratified by Family Size and Age

	Locational Outcomes		
Independent Variables	**Poverty Rate**	**Percent White**	**Percent Voucher Recipients**
		Families with five or more persons	
SOI law in Effect	-0.00	-0.01***	0.03***
	(0.001)	(0.002)	(0.001)
In a Jurisdiction that adopted SOI	-0.02	-0.16	0.02
	(.01)	(62.36)	(0.019)
Difference between SOI jurisdiction and Control jurisdiction while SOI law was in effect	-0.005**	0.00	-0.02***
	(0.002)	(0.003)	(0.001)
Constant	0.13***	0.97***	0.01
	(0.018)	(0.004)	(0.019)
Observations	181,642	181,642	181,613
R-squared	0.559	0.708	0.646
	Elderly Families		
	Locational Outcomes		
Independent Variables	Poverty Rate	Percent White	Percent Voucher Recipients
SOI law in Effect	-0.005***	-0.01***	0.01***
	(0.001)	(0.002)	(0.000)
In a Jurisdiction that adopted SOI	0.25***	-0.44***	0.06***

Table 6. Relationship Between SOI Laws and Locational Outcomes of Voucher Recipients Stratified by Family Size and Age

Independent Variables	Locational Outcomes		
	Poverty Rate	Percent White	Percent Voucher Recipients
		Elderly Families	
	(0.031)	(0.052)	(0.009)
Difference between SOI jurisdiction and Control jurisdiction while SOI law was in effect	-0.01***	0.03***	-0.00***
	(0.001)	(0.002)	(0.000)
Constant	-0.05	0.60***	-0.04***
	(0.040)	(0.080)	(0.012)
Observations	360,427	360,427	360,424
R-squared	0.414	0.593	0.280

Model estimated using OLS with robust standard errors in parentheses
Unit of analysis: Individual Voucher Recipients
*** p<0.01, ** p<0.05, * p<0.1

The second panel in Table six provides results for elderly families. The variable "Difference between SOI jurisdiction and Control jurisdiction while SOI law was in effect" is statistically significant and substantively meaningful for the poverty rate and percent white outcomes, respectively. Column two indicates that voucher recipients living in jurisdictions with SOI laws lived in tracts where the poverty rate was one percentage point lower than voucher recipients that lived in jurisdictions without such laws, during the time when the laws were in effect. Column three indicates that elderly voucher recipients living in jurisdictions with SOI laws lived in tracts where the proportion white was three percentage points higher than voucher recipients that lived in jurisdictions without such laws, during the time when the laws were in effect.

Table seven illustrates the results for blacks and Hispanics. The standard errors are adjusted to account for dependence among observations and fixed effects are used for the LHA that issued the voucher and to identify the comparison area. The models were estimated using OLS regression. For the purposes of brevity only the interaction term "Difference between SOI jurisdiction and Control jurisdiction while SOI law was in effect" is discussed. The top panel of Table 7 illustrates the results for Hispanics. The only outcome where there is a statistically significant and substantively meaningful relationship is for the percent white. Column three shows that that Hispanic voucher recipients living in jurisdictions with SOI laws lived in tracts where the proportion white was one percentage point lower than that found for voucher recipients who lived in jurisdictions without such laws, during the time when the laws were in effect. This is one result in our analyses of locational outcomes where the result is statistically significant, substantively meaningful but the direction of the sign is opposite of what was hypothesized.

Table 7. Relationship Between SOI Laws and Locational Outcomes of Voucher Recipients Stratified by Race and Ethnicity

VARIABLES	Poverty Rate	Percent White	Percent Voucher Recipients
		Locational Outcomes	
		Hispanics	
SOI law in Effect	-0.00***	-0.01***	0.01***
	(0.001)	(0.002)	(0.000)
In a Jurisdiction that adopted SOI	0.00	-0.80	-0.01
	(.)	(383.493)	(.)
Difference between SOI jurisdiction and Control jurisdiction while SOI law was in effect	**0.00**	**-0.01*** **	**-0.00**
	(0.001)	**(0.003)**	**(0.000)**
Constant	0.15***	0.98***	-0.01***
	(0.001)	(0.002)	(0.000)

Table 7. Relationship Between SOI Laws and Locational Outcomes of Voucher Recipients Stratified by Race and Ethnicity

VARIABLES	Locational Outcomes		
	Poverty Rate	Percent White	Percent Voucher Recipients
Observations	217,449	217,449	217,449
R-squared	0.403	0.557	0.175
	Locational Outcomes		
	Blacks		
	Poverty Rate	**Percent White**	**Percent Voucher Recipients**
SOI law in Effect	-0.00***	-0.00	0.01***
	(0.000)	(0.001)	(0.000)
In a Jurisdiction that adopted SOI	0.10	-0.52	-0.05
	(.)	(.)	(3.937)
Difference between SOI jurisdiction and Control jurisdiction while SOI law was in effect	**-0.01***	**-0.002**	**0.001***
	Blacks		
SOI law in Effect	**(0.001)**	**(0.001)**	**(0.000)**
Constant	-0.03	1.24	-0.04
	(.)	(32.712)	(.)
Observations	795,671	795,678	795,678
R-squared	0.359	0.537	0.217

Model estimated using OLS with robust standard errors in parentheses
Unit of analysis: Individual Voucher Recipients
`*** p<0.01, ** p<0.05, * p<0.1`

    The bottom panel of Table seven illustrates the results for black voucher recipients. Here the relationships between SOI laws and locational outcomes are statistically significant and substantively meaningful only for the poverty rate. Column two shows that that black voucher recipients living in jurisdictions with SOI laws lived in tracts where the poverty rate was one percentage point lower than that found for voucher recipients who lived in jurisdictions without such laws, during the time when the laws were in effect. The variable

"Difference between SOI jurisdiction and Control jurisdiction while SOI law was in effect" was statistically significant for the percent white and percent who are voucher recipients too. But the magnitude of these relationships, two-tenths and one tenth of a percentage point, respectively, is too small to be considered meaningful.

Summarizing the Relationship between SOI Laws and Locational Outcomes

Taken together the results presented in this chapter suggest SOI laws have a modest but not particularly powerful effect on locational outcomes. With the exception of one case for Hispanics, all of the coefficients that were statistically significant and substantively meaningful had signs that were consistent with the notion that SOI laws make it easier to move into more advantaged neighborhoods. Because this is consistent with the hypothesized relationships this is evidence that SOI laws do indeed facilitate movement into more advantaged neighborhoods. Moreover, strongest and most substantively meaningful relationships were found for groups who in the past have been found to have an especially hard time using vouchers. This last finding is also consistent with the notion that SOI laws facilitate movement into more advantaged neighborhoods.

The relationship between SOI laws and locational outcomes, however, must be considered modest at best. Substantively meaningful relationships were not found for all of the models. Furthermore, even in the case where the relationships were substantively meaningful they were not especially dramatic. This is admittedly a subjective characterization and perhaps over a longer study period even larger impacts would be observed. Furthermore, the results Hispanics, the third largest group of voucher recipients provided no evidence of SOI laws facilitating movement into more advantaged neighborhoods. Thus, the results presented here can only be characterized as a modest relationship between SOI laws and locational outcomes.

CONCLUSIONS AND POLICY IMPLICATIONS

Housing vouchers have come to supplant production programs as the preferred way to provide housing assistance to the poor. Tenant-based housing vouchers offer greater efficiency and superior choices for the housing assistance recipients. The superiority of these vouchers, however, is predicated on voucher recipients being able to find landlords willing to accept their vouchers. For several reasons, including negative stereotypes of voucher recipients, some landlords prefer not to lease their units to voucher recipients.

SOI laws, which make illegal such discrimination, would seem to have the potential to make it easier for voucher recipients to secure housing. This could lead to at least two types of outcomes. First, utilization rates among housing authorities in jurisdictions with SOI laws might be higher. Second, voucher recipients might find themselves with a more expansive set of housing options and, consequently, find units in less disadvantaged neighborhoods. The research reported here tested these hypotheses.

The evidence is consistent with the notion that SOI laws facilitate the utilization of housing vouchers. Using a difference-in-differences approach, the analyses presented earlier in this paper showed that utilization rates were higher in jurisdictions with SOI laws when compared to utilization rates in jurisdictions without such laws, while the laws were in effect. These results are consistent with the findings of Finkel and Buron (2001) who found success rates to be higher in jurisdictions with SOI laws.

The evidence for SOI laws having an impact on locational outcomes was more equivocal. In several instances there was a statistically significant relationship between residence in a jurisdiction with a SOI law and locational outcomes. Moreover, with one exception in the instances where the relationship was statistically significant and substantively meaningful the direction of the relationship was consistent with the

hypothesized notion that SOI laws facilitate access to more advantaged neighborhoods. Finally, analyses of groups that in the past have had particularly difficult times successfully using vouchers found somewhat stronger relationships in the hypothesized direction between SOI laws and locational outcomes. Despite this evidence the relationship between SOI laws and locational outcomes is best categorized as modest, because although in several instances the relationships between SOI laws and locational outcomes were statistically significant, they were often not substantively meaningful. Furthermore, even when the relationships were substantively meaningful they were not especially dramatic. Finally, Hispanics did not appear to reap any locational benefits from residence in a jurisdiction with SOI laws.

If the results presented in this report are accurate then it appears that SOI laws have a more substantial impact on utilization rates than locational outcomes. One interpretation of this pattern would be that while SOI laws reduce discrimination by landlords, this in and of itself does not open up a substantially wider range of neighborhoods. Voucher recipients may be more successful in their searches but the neighborhoods where they find apartments might not be that different or indeed in the same neighborhoods as to when SOI laws were not in effect.

Another possible interpretation of the pattern described in the preceding paragraph would be if the neighborhoods that voucher recipients moved in themselves changed after voucher recipients moved in. Galster, Tatian et al. (1999) found that the location of vouchers recipients could affect property values. Quite plausibly the settling of voucher recipients into a neighborhood could have an impact on the demographics of a neighborhood as well. More affluent neighbors might flee the neighborhoods that voucher recipients have migrated into due to stereotyped perceptions of the voucher program. SOI

laws might facilitate voucher recipients moving into more advantaged neighborhoods. But these neighborhoods themselves might then change in ways that resulted in these neighborhoods resembling the neighborhoods of voucher recipients living in jurisdictions without SOI laws. In this case SOI laws might not appear to have much of an impact on locational outcomes especially when data to measure locational outcomes is only available intermittently. Even aside from white or middle class flight the movement of voucher recipients into a more advantaged neighborhood might be expected to change the neighborhood's demographics due to the voucher recipients' contribution to the neighborhood's demographic profile. This too would make it harder to detect if voucher recipients were moving to more advantaged neighborhoods.

Finally, the changes in locational outcomes due to SOI laws may not be that great simply because range of neighborhoods with units affordable to voucher recipients is not that much more expansive then the current spatial distribution of voucher recipients. For example, if in a given city there were no units available that were affordable to voucher recipients outside the neighborhoods where voucher recipients currently live, a SOI law might not make much difference in terms of locational outcomes. Indeed McClure (2010) suggests the availability of housing affordable to voucher recipients outside of neighborhoods currently inhabited by voucher recipients is not that great.

It is beyond the scope of this report to confirm or refute any of the aforementioned hypotheses for why the SOI laws appear to have a more significant impact on utilization rates than locational outcomes. But these hypotheses can help us make sense of the pattern of results. Moreover, the hypotheses described in the preceding paragraphs provide a roadmap for future research on SOI laws. It should also be mentioned that the measure of SOI laws used in this report did not take into account the possibility that these laws are

enforced differently across jurisdictions. Although there is no apparent reason that differential enforcement of SOI laws would lead to the pattern of results whereby the impacts of such laws appear to be greater for utilization rates than for locational outcomes, it is a possibility. In addition, differential enforcement of SOI laws may have affected the results in other unknown ways. Here, too, is an avenue for further research.

Implications for Policy

At present, a number of states and local jurisdictions have laws that forbid housing discrimination on the basis of source of income, including housing vouchers. The question that flows from this state of affairs is whether these SOI laws should be maintained or extended. The answer to the question depends on a cost-benefit calculus weighing the costs and benefits of such laws and a moral calculus that considers how just it is to deny individuals housing on the basis of their income source. The findings of this research do not speak to the latter social justice calculus. But the results described earlier can inform the cost-benefit calculus.

The results presented in this report make clear that higher utilization rates are a likely benefit of SOI laws. Policy makers in local jurisdictions can consider this on the plus side of the ledger. The observed impact was an increase in utilization rates of between four and 11 points. In a LHA with 10,000 vouchers this would represent between 400 and 1,100 additional units successfully leased. This is not an inconsequential number. The costs imposed by SOI laws would have to be substantial to warrant a cost-benefit calculus not coming out in its favor.

When turning to the issue of locational outcomes, the benefits of SOI laws are more modest. While there does appear to be a relationship between SOI laws and locational outcomes in the hypothesized direction (i.e. SOI laws lead to residence in more advantaged

neighborhoods), the relationship is not very strong and not applicable to all groups. Only in some circumstances do SOI laws appear to be associated with improved locational outcomes at a level that is substantively meaningful. Yet these modest impacts point toward an expansion of SOI laws for at least two reasons. First, expanding the set of neighborhoods available to voucher recipients is currently one of the goals of federal housing policy (Devine, Gray et al. 2003; HUD 2008). Thus, even if SOI laws have only a modest impact on locational outcomes, this still would be moving toward current policy objectives. It is certainly not the case that SOI laws alone would be expected to expand the geography of opportunity available to voucher recipients and other policies can help achieve the goal of an improved geography of opportunity. Second, although the impacts on locational outcomes were modest SOI laws could be expanded in a way that might be expected to have a more dramatic effect. The SOI laws studied in this report were enacted at the state or local level. But a federal SOI law would likely be more visible and thus have a larger impact. Moreover, a federal law would be enforced by federal authorities who in most instances would be able to bring more resources to bear than a state or local jurisdiction. This should increase the deterrent effect of SOI laws and result in a larger impact for SOI laws.

In sum, the policy choices about SOI laws rest on two sets of calculations, a moral one that weighs the justice of excluding persons based on the source of their income (or gives property owners the right to do so) and a cost-benefit one that considers the benefits and costs of such laws. While the research presented here does not speak to the first calculus, the findings do spell out some of the benefits associated with the implementation of SOI laws. Policy makers can expect an increase in utilization rates and, for some, greater access to less disadvantaged areas. Given the dearth of affordable housing options in many communities, this is not insignificant.

References

Alba, R. D. and J. R. Logan (1993). "MINORITY PROXIMITY TO WHITES IN SUBURBS - AN INDIVIDUAL-LEVEL ANALYSIS OF SEGREGATION." American Journal of Sociology **98**(6): 1388-1427.

Berry, W. B., Evan Ringquist, Richard Fording, and Russell Hanson. 1998. "" 42: 327-48. (1998). "Measuring Citizen and Government Ideology in the American States, 1960-93." American Journal of Political Science **42**: 327-348.

Bostic, R. W., K. C. Engel, et al. (2008). "State and local anti-predatory lending laws: The effect of legal enforcement mechanisms." Journal of Economics and Business **60**: 47-66.

Bostic, R. W. and R. W. Martin (2005). "Have anti-discrimination housing laws worked? Evidence from trends in black homeownership." Journal of Real Estate Finance and Economics **31**(1): 5-26.

Briggs, X. d. S. and P. Dreier (2008) "Memphis Murder Mystery? No, Just Mistaken Identity." Shelterforce.

Buck, Y. (2004). I'm a Soldier. Straight Outta Cashville, Interscope Records.

Bureau, U. S. C. (2009). A Compass for Understanding and Using American Community Survey Data: What Researchers Need to Know. C. Department. Washington, DC, U.S. Government Printing Office.

Collins, W. J. (2004). "The housing market impact of state-level anti-discrimination laws, 1960-1970." Journal of Urban Economics **55**(3): 534-564.

Daniel, T. H. (2010). "Bringing Real Choice to the Housing Choice Voucher Program: Addressing Voucher Discrimination Under the Federal Fair Housing Act." Georgetown Law Journal **98**: 769-794.

Devine, D. J., R. W. Gray, et al. (2003). Housing Choice Voucher Location Patterns: Implications For Participants And Neighborhood Welfare. Washington, D.C., HUD.

Fernandez, M. (2008). Despite New Law, Subsidized Tenants Find Doors Closed New York TImes. New York.

Finkel, M. and L. Buron (2001). Study on Section 8 Voucher Success Rates: Volume I Quantitative Study of Success Rates in Metropolitan Areas. Washington D.C., Abt Associates. **1**.

Finkel, M., J. Khadduri, et al. (2003). Costs and Utilization in the Housing Choice Voucher Program. Washington, D.C., Abt Associates.

Freeman, L. (2002). "Does spatial assimilation work for black immigrants in the US?" Urban Studies **39**(11): 1983-2003.

Freeman, L. (2003). "The impact of assisted housing developments on concentrated poverty." Housing Policy Debate **14**(1-2): 103-141.

Freeman, L. (2010). "African American Locational Attainment before the Civil Rights Era." City & Community **9**(3): 235-255.

Frieden, B. J. (1980). "WHAT HAVE WE LEARNED FROM THE HOUSING ALLOWANCE EXPERIMENT." Habitat International **5**(1-2): 227-254.

Friedman, S. and E. Rosenbaum (2007). "Does suburban residence mean better neighborhood conditions for all households? Assessing the influence of nativity status and race/ethnicity." Social Science Research **36**(1): 1-27.

Galster, G. C., P. Tatian, et al. (1999). "The impact of neighbors who use section 8 certificates on property values." Housing Policy Debate **10**(4): 879-917.

Goering, J. (2003). Political Origins and Opposition. Choosing a Better Life. J. G. a. J. Feins. Washington, D.C., Urban Institute Press.

Goering, J. (2005). Expanding Choice and Integrating Neighborhoods: The MTO Experiment. The Geography of Opportunity. X. d. S. Briggs. Washington, D.C., Brookings**:** 127-149.

Goff, B., Alex Lebedinsky, Stephen Lile (2009). A Matched Pairs Analysis of State Growth Differences. Bowling Green, Western Kentucky University.

Government, U. (1995). Low Income Housing Assistance. (42U.S.C. § 1437(f)). U. Government.

Gross, A. B. and D. S. Massey (1991). "SPATIAL ASSIMILATION MODELS - A MICRO-MACRO COMPARISON." Social Science Quarterly **72**(2): 347-360.

Housing, P. s. C. o. (1982). Report of the Preseident's Commission on Housing. Washington,

D.C.

Housing, U. S. P. s. C. o. U. (1968). U.S. President's Committee on Urban Housing, A Decent Home. Washington, D.C., U.S. GovernmentPrinting Office.

HUD (2008). Expanding Housing Opportunities and Mobility. Housing Choice Voucher Program Guidebook. Q. C. Corporation. Washington, DC, U.S. Department of Housing and Urban Development.

Khadduri, J. (2001). "Deconcentration: What do we Mean? What do we Want?" Cityscape **5**(2): 69-84.

Logan, J. R. and R. D. Alba (1993). "LOCATIONAL RETURNS TO HUMAN-CAPITAL - MINORITY ACCESS TO SUBURBAN COMMUNITY RESOURCES." Demography **30**(2): 243-268.

Logan, J. R., R. D. Alba, et al. (1996). "Making a place in the metropolis: Locational attainment in cities and suburbs." Demography **33**(4): 443-453.

Logan, J. R., B. J. Stults, et al. (2004). "Segregation of minorities in the metropolis: Two decades of change." Demography **41**(1): 1-22.

Lowry, I. S. (1971). Housing Assistance for Low-Income Urban Families: A Fresh Approach. Papers Submitted to Subcommittee on Housing Panels. Washington, D.C., Committee on Banking and Currency, House of Representatives, 92d Congress, First Session**:** 489-524.

Macdonnell, J. G., Bruce E. Kahn (2005). In Search of Decent Housing in the D.C. Metropolitan Area: The Affordable Housing Crisis for Section 8 Voucher Holders. Washington D.C.

Manye, B. and S. Crowley (1999). Scarcity and Success: Perspectives on Assisted Housing. Washington D.C., National Low Income Housing Coalition.

Massey, D. S. and N. A. Denton (1993). American Apartheid. Cambridge, Harvard University Press.

Massey, D. S. and N. A. Denton (1993). American apartheid : segregation and the making of the underclass. Cambridge, Mass., Harvard University Press.

McClure, K. (2008). "Deconcentrating Poverty With Housing Programs." Journal of the American Planning Association **74**(1): 90-99.

McClure, K. (2010). "The Prospects for Guiding Housing Choice Voucher Households to High-Opportunity Neighborhoods " Cityscape **12**(3): 102-124.

Meyer, B. (1995). "Natural and Quasi-Natural Experiments in Economics." Journal of Business and Economic Statistics **12**: 151-162.

Newman, S. J. and A. B. Schnare (1997). ""... And a suitable living environment": The failure of housing programs to deliver on neighborhood quality." Housing Policy Debate **8**(4): 703-741.

Polikoff, A. (2005). "A Vision for the Future: Bringing Gautreaux to Scale." Keeping the Promise:Preserving and Enhancing Housing Mobility in the Section 8 Housing Choice Voucher Program: 137-150.

Rohe, W. M. and L. Freeman (2001). "Assisted housing and residential segregation - The role of race and ethnicity in the siting of assisted housing developments." Journal of the American Planning Association **67**(3): 279-292.

Rosin, H. (2008). American Murder Mystery. The Atlantic. New York.

Sard, B. (2001). "Housing Vouchers Should Be a Major Component of Future Housing Policy for the Lowest Income Families." Cityscape **5**(2): 89-111.

Scrappy, L. (2006). Livin in the Projects. Bred 2 Die Born 2 Live, Reprise / Wea.

Shroder, M. (2003). Locational Constraint, Housing Counseling, and SUccessful Lease-Up. Choosing a Better Life. J. G. a. J. Feins. Washington D.C., Urban Institute Press**:** 59-80.

Spivack, M. S. (2009). Rights Groups Allege Rental Discrimination. Washington Post. Washington, D.C.

Tegeler, P., M. Cunningham, et al. (2005). Keeping the Promise: Preserving and Enhancing Housing Mobility in the Section 8 Housing Choice Voucher Program Conference Report of the Third National Conference on Housing Mobility. Washington, D.C., Poverty & Race Research Action Council.

Tegeler, P., Mary Cunningham, & Margery Austin Turner, Editors (2005). Keeping the Promise: Preserving and Enhancing Housing Mobility in the Section 8 Housing Choice Voucher

Program Conference Report of the Third National Conference on Housing Mobility. Washington, D.C., Poverty & Race Research Action Council.

Weicher, J. C. (1990). The Voucher/Production Debate. <u>Building Foundations</u>. D. D. a. L. C. Keyes. Philadelphia, University of Pennsylvania Press**:** 263-292.

Williamson, J. B. (1974). "Stigma of Public Dependency - Comparison of Alternative Forms of Public Aid to Poor." <u>Social Problems</u> **22**(2): 213-228.

Winnick, L. (1995). "The triumph of housing allowance programs: how a fundamental policy conflict was resolved." <u>Cityscape</u> **1**(3): 95-122.

APPENDIX

Table A1. States and Jurisdictions with SOI Laws

STATES	YEAR ADOPTED
Connecticut	1989
Maine	1975
Massachusetts	1989
Minnesota	1990 (undermined 2003)
New Jersey	2002
North Dakota	1983 &1993
Oklahoma	1985
Oregon	1995 (repealed 2008)
Utah	1989
Vermont	1987
Washington D.C.	2006
Wisconsin	1980
JURISDICTIONS	
Corte Madera, Marin County, CA	2000
East Palo Alto, San Mateo, CA	2000
Los Angeles, Los Angeles County, CA	2002
San Francisco, CA	1998
Champaign, Champaign County, IL	1994
Chicago, Cook County, IL	1990
Harwood Heights, Cook County, IL	2009
Naperville, IL	2000
Urbana, Champaign County, IL	1975
Wheeling, IL	1995
Frederick, Frederick County, MD	2002
Howard County, MD	1992
Montgomery County, MD	1991
Boston, Suffolk County, MA	1980
Cambridge, Middlesex County, MA	1992
Quincy, Norfolk County, MA	1992
Revere, Suffolk County, MA	1994
Ann Arbor, Washtenaw County, MI	1978

Grand Rapids, Kent County, MI	2000
Buffalo, Erie County, NY	2006
Nassau County, NY	2000
New York City, Bronx-Kings-Queens-Richmond-New York Counties, NY	2008
West Seneca, Erie County, NY	1979
Borough of State College, Centre County, PA	1993
Philadelphia, Philadelphia County, PA	1980
Bellevue, King County, WA	1990
King County, WA	2006
Seattle, King County, WA	1989
Dane County, WI	1987
Madison, Dane County, WI	1977
Ripon, Fond du Lac County, WI	1988
Sun Prairie, Dane County, WI	2007
Wauwatosa, Milwaukee County, WI	Circa 1985
Iowa City, IA	1997
St. Louis City, MO	2006

Table A2.

<div align="center">

Source of Income Discrimination Research Project
Methodology for Legal Research Component

</div>

- **Step 1: Confirm Date of Enactment**
    - o Verify correct enactment date through researching the general statute and ordinances i.e. when adopted, when enacted, etc.
    - o Make sure it is not an amendment of an earlier law.
    - o See if there are reported cases that cite this date. Verify whether statutory citation is proper and cite as needed.

- **Step 2: Confirm Enforcement/Legal Status of Law**
    - o Review relevant case law. Research cases that uphold or interpret the constitutionality of the statute.
    - o Confirm applicability to Section 8 Housing Choice Vouchers.

- **Step 3: Describe Enforcement System**
    - o Research what kind of enforcement system (i.e. administrative or judicial) is in place through reviewing the statute and online sources.
    - o Cite to source of this information, i.e. case law or language included in the statute.
    - o Are attorney's fees for successful plaintiffs?

- **Step 4: Local Advocacy Environment**
    - o Research whether there are organizations that help victims of source of income discrimination bring their complaints. (Internet and phone research).
        - ▪ Look up list of local groups and call them to ask.
    - o Is there enough funding for enforcement?

- **Step 5: Enforcement Record**
    - o Research volume of complaints brought under the statute using the most recent agency annual report.
    - o Call organizations that file these cases, if any.
    - o Develop simple typology to "rank" enforcement systems.

- **Step 6: Review**
    - o General verification and editing, updating national inventory.
    - o Are there other policies in place that could affect success of the law i.e., HUD policies that affect mobility?
    - o Note any local studies or media coverage of source of income discrimination and enforcement.

Step 7: Review
- o Review parallel jurisdictions selected by Professor Freeman to ensure no source of income laws in effect.

Sources: Westlaw (for statutes, case law, and most local ordinances), state legislative websites (for additional legislative history), local housing codes, state human rights agency annual reports, phone interviews with selected staff at fair housing organizations.

Table A3.		
Jurisdiction	**PHA_CODE**	**Housing Authority**
Washington D.C.	**DC001**	**D.C Housing Authority**
	DC880	**Community Connections**
	DC101	**Kenilworth Parkside RMC**
Washington D.C. Controls	VA028	Arlington County Dept. of Human Services
	VA004	Alexandria Redevelopment & Housing Authority
	MD015	Housing Authority of Prince Georges County
Camden County, NJ	**NJ073**	**Borough of Clementon Housing Authority**
	NJ115	**Cherry Hill Housing Authority**
	NJ118	**Pennsauken Housing Authority**
Camden County, NJ Controls	PA012	Montgomery County Housing Authority
Gloucester County, NJ	**NJ204**	**Gloucester County Housing Authority**
Gloucester County, NJ Control	PA007	Chester Housing Authority
Hunterdon County, NJ	**NJ084**	**Hunterdon County Division of Housing**
	NJ215	**Burlington County Housing Authority**
	NJ212	**Hamilton Township HA**
Hunterdon County, NJ Controls	PA051	Bucks County Housing Authority
Warren County, NJ	**NJ102**	**Warren County Housing Authority**
	NJ089	**Clifton Housing Authority**
	NJ088	**Phillipsburg DCD**
Warren County, NJ Controls	PA011	Bethlehem Housing Authority
	PA024	Easton Housing Authority
	PA076	Northampton County Housing Authority
Passaic County, NJ	**NJ013**	**Passaic Housing Authority**
	NJ021	**Paterson Housing Authority**
	NJ089	**Clifton Housing Authority**
	NJ090	**Passaic County Housing Authority**
	NJ091	**Housing Authority of the City of Paterson**
Passaic County, NJ controls	NY051	Housing Authority of Newburgh
	NY125	Village of Highland Falls
	NY134	Port Jervis CDA
	NY158	Village of Kiryas Joel HA

Bergen County, NJ	**NJ011**	**Housing Authority of the Borough of Lodi**
	NJ055	**Englewood Housing Authority**
	NJ067	**Bergen County Housing Authority**
	NJ070	**Cliffside Park Housing Authority**
	NJ071	**Fort Lee Housing Authority**
	NJ075	**Edgewater Housing Authority**
Bergen County, NJ controls	NY084	Town of Ramapo Housing Authority
	NY114	Village of Nyack HA
	NY138	Village of New Square PHA
	NY148	Village of Spring Valley HA
	NY160	Village of Kaser
City of Los Angeles, CA	**CA004**	**Housing Authority of the City of Los Angeles**
City of Los Angeles, CA controls	CA103	Housing Authority of the City of Redondo Beach
	CA111	Housing Authority of the City of Santa Monica
	CA114	Housing Authority of the City of Glendale
	CA117	Pico Rivera Housing Assistance Agency
	CA118	Housing Authority of the City of Norwalk
	CA120	Housing Authority of the City of Baldwin Park
	CA123	Housing Authority of the City of Pomona
	CA126	Hawthorne Housing
	CA139	Housing Authority of the City of Lomita
	CA068	City of Long Beach Housing Authority
	CA071	City of Compton Housing Authority
	CA079	Housing Authority of the City of Pasadena
	CA082	Housing Authority of the City of Inglewood
	CA105	Housing Authority of the City of Burbank
	CA110	Housing Authority of Culver City
	CA119	Housing Authority of the City of South Gate
	CA121	Housing Authority of the City of Torrance
	CA135	Housing Authority of the City of Lakewood
	CA136	Housing Authority of the City of Hawaiian Gardens
	CA137	Housing Authority of the City of Paramount
	CA138	Housing Authority of the City of Lawndale
	CA145	Housing Authority of the City of West Hollywood
	CA147	Housing Authority of the City of Santa Fe Springs
City of Buffalo, NY	**NY002**	**Buffalo Municipal Housing Authority**
	NY409	**City of Buffalo**
	NY449	**Buffalo Municipal Housing Authority**

City of Buffalo, NY controls	NY091	Town of Amherst
	NY400	Kenmore Municipal Housing Authority
	NY405	City of North Tonawanda
Grand Rapids, MI	**MI073**	**Grand Rapids Housing Commission**
Grand Rapids, MI controls	MI093	Rockford Housing Commission
	MI115	Wyoming Housing Commission
Nassau County, NY	**NY894**	**Family and Children's Association**
	NY147	**Village of Sea Cliff**
	NY151	**Village of Farmingdale HA**
	NY159	**Village of Rockville Centre**
	NY892	**Town of Hempstead Dept. of Urban Renewal**
	NY085	**Village of Hempstead HA**
	NY086	**North Hempstead Housing Authority**
	NY023	**Freeport Housing Authority**
	NY121	**Glen Cove CDA**
	NY120	**Village of Island Park HA**
Nassau County, NY controls	NY035	Town of Huntington Housing Authority
	NY077	Town of Islip Housing Authority
	NY127	Riverhead Housing Development Corporation
	NY128	Village of Patchogue CDA
	NY130	Town of Babylon
	NY141	Town of Southampton
	NY146	Village of Greenport Housing Authority
	NY149	Town of Brookhaven HCDIA
	NY152	North Fork Housing Alliance Inc.
	NY154	Town of East Hampton
	NY155	Town of Smithtown
	NY888	Mercy Haven Inc.
	NY891	Options for Community Living
Multnomah County, OR	**OR002**	**Housing Authority of Portland**
Multnomah County, OR control	WA008	Housing Authority of the City of Vancouver
San Francisco, CA	**CA001**	**Housing Authority of the City & County of SF**
San Francisco, CA controls	CA003	Oakland Housing Authority
	CA058	CITY OF BERKELEY HOUSING AUTHORITY
	CA062	CITY OF ALAMEDA HOUSING AUTHORITY

	CA067	ALAMEDA COUNTY HSG AUTH
	CA074	HSG AUTH OF THE CITY OF LIVERMORE
	CA014	County of San Mateo Housing Authority
	CA052	HOUSING AUTHORITY OF COUNTY OF MARIN
Frederick County, MD	**MD003**	**Frederick Housing Authority**
Frederick County, MD controls	MD006	Hagerstown Housing Authority
	MD028	Housing Authority Of Washington County
New York City, NY	**NY005**	**New York City Housing Authority**
	NY110	**New York City Department of Housing Preservation & Dev.**
New York City, NY, controls	NY038	Mount Kisco Housing Authority
	NY057	Greenburgh Housing Authority
	NY094	Village of Ossining Section 8 Program
	NY101	Village of Mamaroneck HA
	NY111	Town of Eastchester
	NY113	City of New Rochelle Housing Authority
	NY114	Village of Nyack HA
	NY115	City of White Plains Community Dev. Prog.
	NY116	Village of Pelham HA
	NY117	Town of Mamaroneck HA
	NY118	Village of Port Chester
	NY123	City of Peekskill
	NY132	Town of Yorktown
	NY165	Tuckahoe HA, Village of
	NY176	Village of Mount Kisco
Clay County, MN	**MN017**	**MOORHEAD PUBLIC HOUSING AGENCY**
	MN164	**CLAY COUNTY HRA**
Clay County, MN controls	ND001	Housing Authority of Cass County
	ND014	Fargo Housing and Redevelopment Authority
Winona County, MN	**MN006**	**HRA of WINONA, MINNESOTA**
Winona County, MN control	WI166	Trempealeau County Housing Authority
Washington County, MN	**MN212**	**WASHINGTON COUNTY HRA**
Washington County, MN control	WI060	River Falls Housing Authority
St. Louis County, MN	**MN007**	**HRA of VIRGINIA, MINNESOTA**

	MN003	**HRA of DULUTH, MINNESOTA**
St. Louis County, MN control	WI001	Housing Authority of the City of Superior

Note: LHAs in jurisdictions that had a SOI at some point during the study period are in bold.

Figure A1.

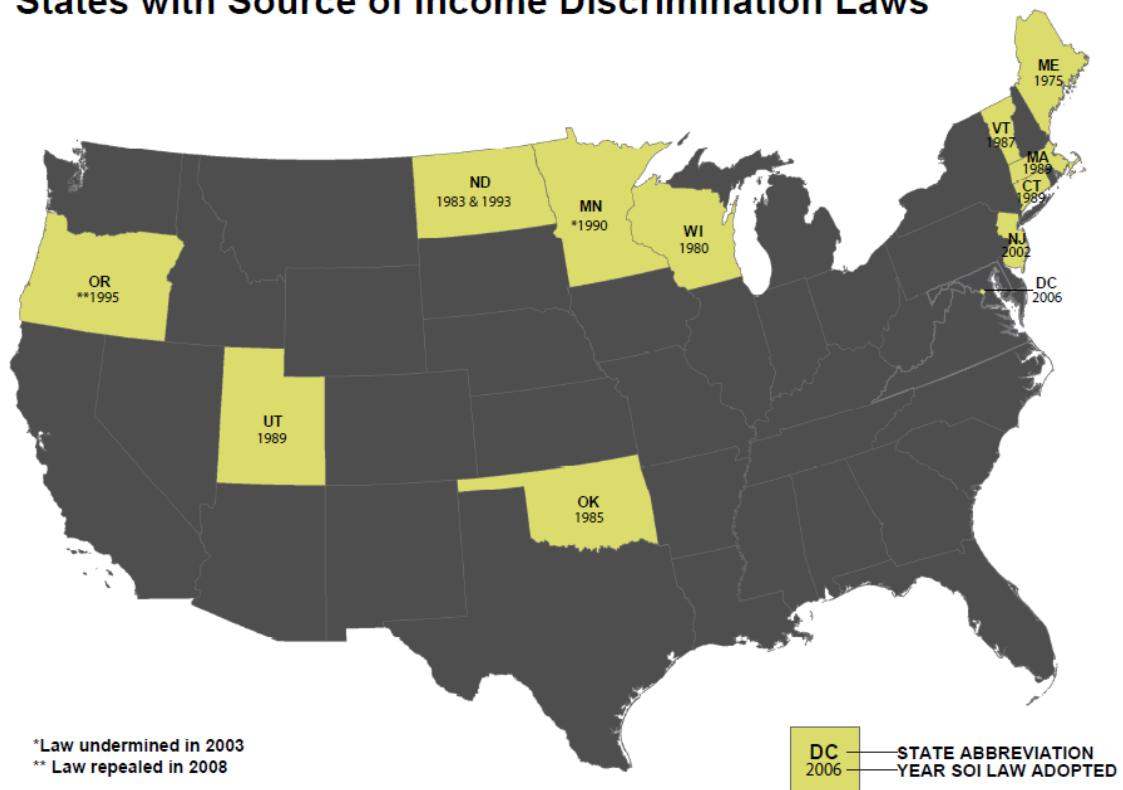## States with Source of Income Discrimination Laws

ME
1975

VT
1987

MA
1989

CT
1989

ND
1983 & 1993

MN
*1990

WI
1980

OR
**1995

NJ
2002

DC
2006

UT
1989

OK
1985

*Law undermined in 2003
** Law repealed in 2008

DC
2006 —— STATE ABBREVIATION
       —— YEAR SOI LAW ADOPTED

Figure A2.

Jurisdictions with Source of Income Discrimination Laws