

ENDING HOMELESSNESS, REDUCING POVERTY, ADVANCING RACIAL EQUITY AND ECONOMIC OPPORTUNITY BY ADOPTING UNIVERSAL HOUSING VOUCHERS

Statement of

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UNIVERSAL VOUCHERS: ENDING HOMELESSNESS AND EXPANDING ECONOMIC OPPORTUNITY IN AMERICA

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* The views expressed are my own and should not be attributed to the Urban Institute, its trustees, or its funders.

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Thank you for asking me to testify at this hearing. My name is Mary Cunningham and I am the vice president for metropolitan housing and communities at the Urban Institute in Washington, DC. The views expressed here are my own and should not be attributed to the Urban Institute, its trustees, or its funders. This testimony draws upon two posts I wrote for *Urban Wire*, Urban Institute's blog.¹

A Public Health Crisis on Top of a Housing Crisis

When the pandemic hit in March 2020, the United States had already been grappling with a severe and enduring affordable housing and homelessness crisis. On single night in 2020, about 580,000 people were experiencing homelessness, 226,000 of which were living on the street unsheltered.² Homelessness had been increasing for four years. Homelessness is a symptom and an outcome of the affordable housing crisis. Nearly 11 million renter households were struggling, paying more than half their incomes toward this major household expense.³ Many were on the edge of missing rent payments at risk for eviction. According to the Eviction Lab,⁴ landlords were filing nearly 3.7 million evictions annually.

But the rental crisis does not impact everyone equally. People of color are disproportionately affected by homelessness. Black people make up 12 percent of the population but 39 percent of individuals experiencing homelessness and 53 percent of people in families who experience homelessness.⁵ In comparison, white people are significantly underrepresented in these groups. The disparities continue across the housing continuum. Black households are more likely to be renters and are more likely to be rent burdened than white households.⁶ Black renters receive a disproportionate number of eviction filings, and Black Latinx female renters are also more likely to experience eviction than their male counterparts.⁷ These disparities exist largely because of a history of housing discrimination and segregation, which have locked people of color out of opportunities. As reported

https://www.jchs.harvard.edu/sites/default/files/reports/files/Harvard_JCHS_Americas_Rental_Housing_2020.pdf.

¹ Mary Cunningham, "It's Time to Reinforce the Housing Safety Net by Adopting Universal Vouchers for Low-Income Renters" *Urban Wire*, April 7, 2020, https://www.urban.org/urban-wire/its-time-reinforce-housing-safety-net-adopting-universal-vouchers-low-income-renters; Mary Cunningham, Martha Galvez, and Emily Peiffer, "Landlords Limit Voucher Holders' Choice in Where They Can Live," *Urban Wire*, August 20, 2018, https://www.urban.org/urban-wire/landlords-limit-voucher-holders-choice-where-they-can-live.

² Meghan Henry, Tanya de Sousa, Caroline Roddey, Swati Gayen, and Thomas Joe Bednar, "The 2020 Annual Homelessness Assessment Report (AHAR) to Congress, Part 1: Point-in-Time Estimates of Homelessness" (Washington, DC: US Department of Housing and Urban Development, 2021). https://www.huduser.gov/portal/sites/default/files/pdf/2020-AHAR-Part-1.pdf

³ Joint Center for Housing Studies of Harvard University, *America's Rental Housing* (Cambridge, MA: Joint Center for Housing Studies of Harvard University, 2020)

⁴ See https://evictionlab.org.

⁵ Henry et al. "The 2020 Annual Homelessness Assessment Report."

⁶ Joint Center for Housing Studies of Harvard University, America's Rental Housing.

⁷ Peter Hepburn, Renee Louis, and Matthew Desmond, "Racial and Gender Disparities among Evicted Americans" *Sociological Science* 7 (2020): 649–62.

recently in the *New York Times*, "there is a straight line from the history of redlining to today's homelessness crisis."⁸

The housing safety net was unprepared to respond to the urgent needs of the COVID-19 pandemic, which is a public health crisis layered on top of a housing crisis. As the pandemic ravaged communities across the country, people living on the streets were highly exposed to the virus. People living in congregate shelters and crowded motels had no means for social distancing. As schools closed across the country, an estimated 1.5 million school-age children were homeless or in doubled-up living situations. Renters, who are more vulnerable than homeowners, fell behind on their rent: in June 2020, 11.4 million were behind on rent. Low-income renters—many of whom work in the service industries hit hard by the pandemic shutdown—were left with the constant threat of eviction.

The COVID-19 pandemic demonstrated something we already knew from the research but has been largely ignored by policymakers: home matters. Housing provides stability for people to flourish, and it provides a platform for opportunity. For a child experiencing the instability of homelessness, it's hard to learn in a classroom or find a space for homework. For parents, the anxiety and stress of not being able to keep your children safe at home is unbearable and makes it difficult to focus on anything else, such as going to work or taking care of their health. Housing also provides the keys to opportunity. A person's zip code can affect their access to high-quality schools and a healthy neighborhood, and over the long term these affect their educational outcomes and income as adults.

The pandemic also illuminated that we are all connected. When renters can't pay their landlords, landlords can't pay their mortgages, and banks can't pay their investors; this can send ripple effects across housing markets and beyond. And from a public health perspective, a lack of stable housing for many not only causes immense human suffering for those enduring homelessness or facing the constant threat of eviction, it also puts the rest of the country as risk, increasing COVID-19 transmission rates and making it difficult to contain the virus.¹¹

After months of debate, Congress responded with 46 billion in emergency housing assistance through the CARES ACT and the American Rescue Plan, creating a new emergency rental assistance programs run through the US Treasury. Policymakers had to reinvent the wheel, standing up a program in a matter of weeks. Today, states and localities are trying to get that assistance to people before the clock runs out on the CDC eviction moratorium, which expires June 30, 2021. We are not beyond the possibility of a mass eviction: the threat still looms. Now, as of the end of May 2021, an

⁸ Jugal K. Patel, Tim Arango, Anjali Singhvi, and Jon Huang. "Black, Homeless, and Burdened by L.A.'s Legacy of Racism," *New York Times*, December 22, 2019, https://www.nytimes.com/interactive/2019/12/22/us/losangeles-homeless-black-residents.html.

⁹ National Center on Homeless Education, "Federal Data Summary School Years 2015-2016 Through 20217-2018" (Greensboro, NC: National Center on Homeless Education, 2020). https://nche.ed.gov/wp-content/uploads/2020/01/Federal-Data-Summary-SY-15.16-to-17.18-Published-1.30.2020.pdf.

¹⁰ "Table 1b. Last Month's Payment Status for Renter Occupied Housing Units, By Select Characteristics." Census Pulse Data, Week 5 Household Pulse Survey, May 29-June 2, 2020, https://www.census.gov/data/tables/2020/demo/hhp/hhp5.html.

¹¹ Anjalika Nande, Justin Sheen, Emma L. Walters, Brennan Klein, Matteo Chinazzi, Andrei H. Gheorghe, Ben Adlam, et al., "The Effect Of Eviction Moratoria on the Transmission of SARS-CoV-2" *Nature Communications* 12 (2021): 2274, https://doi.org/10.1038/s41467-021-22521-5.

estimated 7 million renters are still behind on their rent and about 3 million people report a likelihood of facing eviction.¹²

We could have been more prepared if we as a nation had invested in housing. The US already has a system for helping low-income renters: the federal Housing Choice Voucher Program. If housing assistance were available to everyone who qualified for it before the pandemic, many people would be better able to manage a sudden income loss. Households would simply provide documentation of a loss in income to public housing authorities, and those authorities would adjust their rent to reflect their new income or unemployment. The government would make up the difference, protecting the renter and landlord from loss of income. The voucher program would have provided social insurance against exactly the type of problem the country is facing right now.

Importantly, with a voucher, payments go directly to landlords, which ensures rents get paid and landlords in turn can pay their mortgages. Bureaucratic hurdles that have prevented landlords from participating in the voucher program, such as unit inspections, could be waived. Considering the alternative costs or potential vacancies, many more landlords would find participating in a program with a government guarantee much more attractive. Evidence from a survey conducted during the pandemic in February 2021 found that voucher holders owed less unpaid rent, and most landlords who accepted vouchers had a positive experience, but the pandemic didn't change the share of landlords who didn't accept vouchers (about 50 percent of those surveyed).¹³

Unfortunately, the Housing Choice Voucher Program, like much of our housing safety programs, has been woefully underfunded. Only one in five people who qualify for housing assistance receives it.¹⁴ People wait years on a waiting list, and many housing authorities have simply closed their lists and are no longer accepting applications.¹⁵ When housing authorities do open their lists, they are overwhelmed with applicants.

It's Time to Reinforce the Housing Safety Net by Adopting Universal Housing Vouchers

The Housing Choice Voucher Program is an evidence-based program: vouchers reduce homelessness, help people afford housing, and have benefits that go beyond housing, including reducing poverty, helping families exit the child welfare system—and if in low-poverty neighborhoods—reducing diabetes

¹² "Table 1b. Last Month's Payment Status for Renter Occupied Housing Units, By Select Characteristics," Census Pulse Data, Week 30 Household Pulse Survey: May 12-May 24, 2021, https://www.census.gov/data/tables/2020/demo/hhp/hhp5.html.

¹³ Jung Choi and Laurie Goodman, "Housing Vouchers Have Helped Tenants and Landlords Weather the Pandemic" *Urban Wire*, March 23, 2021, https://www.urban.org/urban-wire/housing-vouchers-have-helped-tenants-and-landlords-weather-pandemic.

¹⁴ G. Thomas Kingsley, "Trends in Housing Problems and Federal Housing Assistance (Washington, DC: Urban Institute, 2017). https://www.urban.org/research/publication/trends-housing-problems-and-federal-housing-assistance.

¹⁵ Alicia Mazzara, "Housing Vouchers Work: Huge Demand, Insufficient Funding for Housing Vouchers Means Long Waits" (Washington, DC: Center on Budget and Policy Priorities, 2017), https://www.cbpp.org/blog/housing-vouchers-work-huge-demand-insufficient-funding-for-housing-vouchers-means-long-waits.

and obesity among adults, and increasing children's educational attainment and long-term earnings prospects. ¹⁶ Expanding vouchers to all those who qualify could produce significant returns on investment.

To understand the impacts of policy changes to safety-net programs both at the national and state levels, the Urban Institute developed the Analysis of Transfers, Taxes, and Income Security (ATTIS) model.¹⁷ ATTIS is a powerful forecasting tool to provide estimates by state because it starts with a baseline of data from the US Census Bureau's American Community Survey (ACS).

Using ATTIS, we modeled expanding the Housing Choice Voucher Program to everyone who is eligible—that would be all households with an income of up to 50 percent of the area median income who pay more than 30 percent of their income on rent. We assumed a 70 percent take up rate. We found that expanding assistance to everyone who qualifies would cover an additional 19.7 million people in 8.2 million households beyond those currently receiving assistance. The average cost of a household subsidy for the new recipients would be \$628 a month, or \$7,530 a year. The US total for extending coverage to these additional households would be about \$62 billion a year. This modeling was conducted before the pandemic, and we are currently updating our models to reflect more recent data, but this gives us a sense of those who will have ongoing need for rental assistance beyond the pandemic.

Expanding Housing Assistance to All Those Who Qualify Would Have Sweeping Benefits

Homelessness would be rare and, if it occurred, it would be brief. The formula for reducing homelessness is helping more people exit homelessness ("out-flow") than those who are entering homelessness ("in-flow"). The way to do that is to provide housing for people exiting homelessness and keep those who are already housed in their housing. A US Department of Housing and Urban Development study found that housing vouchers were overwhelmingly

¹⁶ Daniel Gubits, Marybeth Shinn, Michelle Wood, Stephen Bell, Samuel Dastrup, Claudia D. Solari, Scott R. Brown, Debi McInnis, Tom McCall, Utsav Kattel, Abt Associates, Inc., and Vanderbilt University, "Family Options Study: 3-Year Impacts of Housing and Services Interventions for Homeless Families" (Washington, DC: US Department of Housing and Urban Development, 2016); Michelle Wood, Jennifer Turnham, and Gregory Mills, "Housing Affordability and Family Well-Being: Results from the Housing Voucher Evaluation" Housing Policy Debate 19, no. 2 (2008): 367–412; Raj Chetty, Nathaniel Hendren, and Lawrence F. Katz, "The Effects of Exposure to Better Neighborhoods on Children: New Evidence from the Moving to Opportunity Experiment." American Economic Review 106, no. 4 (2016): 855–902. Ludwig, Jens, and Lisa Sanbonmatsu, Lisa Genetian, Emma Adam, Greg J. Duncan, Lawrence F. Katz, Ronald C. Kessler, Jeffrey R. Kling, Stacy Tessler Lindau, Robert C. Whitaker, and Thomas W. McDade. "Neighborhoods, Obesity, and Diabetes — A Randomized Social Experiment," October 20, 2011 New England Journal of Medicine 2011; 365:1509-1519

¹⁷ For more about ATTIS, see Archana Pyati, "The Analysis of Transfers, Taxes, and Income Security (ATTIS) Model" (Washington, DC: Urban Institute, 2020). https://www.urban.org/research/publication/analysis-transfers-taxes-and-income-security-attis-model.

¹⁸ Laura Wheaton, Danielle Kwon, and Mary Cunningham, "It's time to Reinforce the Housing Safety Net by Adopting Universal Vouchers for Low-Income Renters, Methodology" (Washington, DC: Urban Institute, 2020); Mary Cunningham, "It's time to Reinforce the Housing Safety Net by Adopting Universal Vouchers for Low-Income Renters," *Urban Wire*, April 7, 2020, https://www.urban.org/urban-wire/its-time-reinforce-housing-safety-net-adopting-universal-vouchers-low-income-renters.

the most effective program for ending homelessness. ¹⁹ Providing housing vouchers to everyone who qualifies would essentially end homelessness. For those who need additional supports, universal vouchers could provide the housing assistance needed to match with supportive services and provide supportive housing. A recent study from Denver shows that people experiencing long-term homelessness can exit homelessness by using a Housing First approach and providing a combination of supportive housing and rental assistance.²⁰

- Universal vouchers would reduce poverty. Rent is often the single biggest expense in household budgets. When households are rent burdened, they often have to forgo other necessities such as food or medical care. According to Columbia University, expanding housing vouchers to all eligible could help reduce poverty by 9.3 million people, or about 3 percentage points.²¹ With expansion of vouchers, the poverty rate would be brought down to just under 10 percent. Expansion of vouchers could also reduce racial disparities in poverty, bringing poverty among white households down one percentage point to 7.5 percent, among Black households from 20 percent to 15 percent, and among Hispanic households from 20 percent to 13 percent.²²
- Universal vouchers would close racial disparities in housing. Housing assistance is a powerful tool in eliminating racial disparities among renters, and expanding assistance could eliminate or significantly narrow disparities. Our simulation of current assisted housing programs reveals that housing assistance currently helps eliminate racial disparities in renter cost burden. Without accounting for current housing assistance, we found 43 percent of white households are cost burdened compared with 55 percent of Black households, 54 percent of Hispanic households, and 45 percent of Asian households. After estimating the distribution of current assisted housing programs by race and ethnicity, we found assisted housing nearly eliminated the racial disparity in housing cost burden between Black and white households (39 percent compared with 38 percent being cost burdened, respectively), but not between Hispanic households and white households (47 percent versus 38 percent). Similar gaps remain for Asian and other households. Further expanding housing assistance would reduce rent burden among Hispanic households to 46 percent experiencing rent burden (down 8 percentage points) and to 41 percent of Asian households rent burdened (down 4 percentage points). Providing housing assistance would go a long way toward decreasing the burden that high rent brings and toward reducing housing stability and homelessness, but it would not overcome the challenges of discrimination in the housing market or end long-standing patterns of racial segregation that remain today.

¹⁹ Gubits et al., "Family Options Study"; Jill Khadduri, "Housing Vouchers Are Critical for Ending Family Homelessness" Washington, DC: National Alliance to End Homelessness, 2008.

²⁰ Mary Cunningham, Ruth Gourevitch, Michael Pergamit, Sarah Gillespie, and Devlin Hanson, "Denver Supportive Housing Social Impact Bond Initiative: Housing Stability Outcomes" (Washington, DC: Urban Institute, 2018).

²¹ Collyera, Sophie and Christopher Wimera, Megan Currana, Katherine Friedmana, Robert Paul Hartleya, David Harrisab, and Andrew Hintona "Housing Vouchers and Tax Credits: Pairing the Proposal to Transform Section 8 with Expansions to the EITC and the Child Tax Credit Could Cut the National Poverty Rate by Half," October 7, 2020 (New York City: Columbia University).

²² Collyera et al., "Housing Vouchers and Tax Credits."

The housing market could absorb the adoptions of universal housing vouchers and help stabilize landlords. Most of the people in need of rental assistance are already housed. A voucher would help make their rent more affordable and allow them to lower their rent burden and stabilize in place. Will Fischer recently wrote about the ability of the market to absorb vouchers noting the number of vacant units and the success of past expansions; he cites a study by Michael D. Eriksen and Amanda Ross who modeled the impact of expansion on housing markets and found that increasing vouchers does not affect the overall price of rental housing, but it does allow voucher holders to rent more expensive units after receiving the subsidy, suggesting the voucher allows "recipients to vacate lower quality units to occupy higher quality units." Implementation of a major voucher expansion will matter and should be closely evaluated and monitored. One key to success is landlord participation. And there are ways to help ensure adoption of universal vouchers is implemented smoothly.

Implementation and Enhancements

Housing Choice Vouchers have some limitations. Expansion of the Housing Choice Voucher Program provides an opportunity to optimize the program. Here I outline some improvements to the program that would help ensure potential benefits from vouchers. Many of these enhancements will require a boost in administrative fees to help public housing agencies pay for the additional services. In addition to some program improvements, a significant investment in housing vouchers should be one component of a comprehensive housing strategy that includes land-use and zoning reform and investments in the development of hard units.

Improvements to the Program

Although effective, the voucher program is not fully optimized. An incremental expansion would require prioritizing specific populations to ensure the first goal of ending homelessness is achieved. Landlord participation and setting rents at the right level will also be critical.

- Target new vouchers to those most vulnerable. To end homelessness, housing subsidies have to inoculate those who are most at risk of losing their housing. Any expansion of the voucher program should target first those who are experiencing homelessness, have disabilities, have large families, are survivors of domestic violence, or are low income and severely rent burdened. Income levels should prioritize those who are most likely to become homeless (that is, those who have incomes at or below 15 percent of the area median income) and then be expanded upward to those below 30 percent of the area median income, and so on up the income ladder with each tranche of expansion. Public housing agencies should design targeted outreach programs to immigrant communities.
- Include source-of-income protections and small-area fair market rents. Landlord participation
 is critical for the success of the program. Unfortunately, landlords in many areas reject

²³ Michael D. Eriksen and Amanda Ross, "Housing Vouchers and the Price of Rental Housing" *American Economic Journal: Economic Policy* 7, no. 3 (2015): 154–76; Will Fischer, "Rental Markets Can Absorb Many Additional Housing Vouchers," Center on Budget and Policy Priorities blog, May 28, 2021.

voucher holders at high rates. In Los Angles, for example, 74 percent of landlords reject voucher holders, and in Fort Worth, rejection rates are even higher, at 78 percent.²⁴ Some state and local jurisdictions have enacted ordinances that prohibit landlords from discriminating against voucher holders, but there are no national protections. Many jurisdictions across the country are considering such laws, but only one in three voucher holders are protected by source-of-income antidiscrimination laws, and national protections are necessary to cover all voucher holders.²⁵ Congress should include a national source-of-income protections to end landlord discrimination against voucher holders. The Federal Housing Finance Agency could also require that landlords who hold federally backed mortgages accept rental assistance. In addition to protecting voucher holders against discrimination, policymakers should test ways to boost landlord participation by making the program more attractive and efficient for landlords. Strategies should include setting rents at competitive levels through small-area fair-market rents.²⁶ Adopting payment standards that are better aligned with market rents could make the Housing Choice Voucher program more appealing to landlords in high-rent markets.

Provide housing search, navigation, and financial assistance. Providing housing-search assistance and help navigating the housing market and financial supports for security deposits have been shown to increase the success of voucher holders leasing up in low-poverty areas. These services are often called voucher mobility programs. These programs, however, remain uncommon. Creating Moves to Opportunity, an experimental study that showed providing services and financial supports to voucher participants increases moves to low-poverty neighborhoods, provides some insight about what works.²⁷ Urban Institute researchers have calculated the potential benefits of expanding mobility programs to 25 percent of families with vouchers living in high-poverty neighborhoods, finding these children could see as much as \$8.63 billion in increased lifetime earnings if they received help moving from high-poverty neighborhoods to low-poverty neighborhoods.²⁸ Our findings on the difficulty identifying landlords who accept vouchers—particularly in low-poverty areas—coupled with the evidence base on the importance of living in high-opportunity neighborhoods, highlight the importance of housing search assistance. The US Department of Housing and Urban Development

²⁴ Mary Cunningham, Martha M. Galvez, Claudia Aranda, Robert Santos, Douglas A. Wissoker, Alyse D. Oneto, Rob Pitingolo, and James Crawford, "A Pilot Study of Landlord Acceptance of Housing Choice Vouchers" (Washington, DC: Urban Institute, 2018).

²⁵ Alison Bell, Barbara Sard, and Becky Koepnick, "Prohibiting Discrimination against Renters Using Housing Vouchers Improves Results" (Washington, DC: Center on Budget and Policy Priorities, 2018), https://www.cbpp.org/research/housing/prohibiting-discrimination-against-renters-using-housing-vouchers-improves-results.

²⁶ Center on Budget and Policy Priorities, "A Guide to Small Area Fair Market Rents: How State and Local Housing Agencies Can Expand Opportunities for Families in All Metro Areas" (Washington, DC: Center on Budget and Policy Priorities, 2018), https://www.cbpp.org/research/housing/a-guide-to-small-area-fair-market-rents-safmrs.

²⁷ Peter Bergman, Raj Chetty, Stefanie DeLuca, Nathaniel Hendren, Lawrence Katz, and Christopher Palmer, "Creating Moves to Opportunity: Experimental Evidence on Barriers to Neighborhood Choice" (Cambridge, MA: Opportunity Insights, 2020), https://opportunityinsights.org/wp-content/uploads/2019/08/cmto_paper.pdf.

²⁸ Martha Galvez and Sarah Oppenheimer, "Taking Neighborhood Mobility to Scale through the Housing Choice Voucher Program" (Washington, DC: Urban Institute, 2020).

recently launched a nine-site Housing Mobility Demonstration to learn more about what works in helping families use vouchers to move to low-poverty neighborhoods.²⁹

Alignment with a Broader Housing Strategy

Expanding access to vouchers is an important part of growing the housing safety net, especially for low-income households, but expansion of vouchers must be in alignment with a broader housing strategy that includes land-use and zoning reform and the development of affordable housing units.

- Provide carrots and sticks for land use and zoning reform. State and local governments hold the levers to affordable housing production and preservation through local land-use and zoning policies. In most places across the country, exclusionary zoning, which prohibits the development of multifamily housing and adds other requirements such as parking or minimum lot sizes, makes it impossible to develop affordable housing for families. Further, it drives up the cost of housing. Adopting local policies that are friendly to affordable housing can stretch subsidy dollars by lowering rents overall and can help bypass "not-in-my-backyard" issues that are major roadblocks to the development of affordable housing. Some states and localities will respond to carrots through competitive grants, but others may need sticks (for example, withholding federal transportation funding and instituting requirements to eliminate barriers to affordable housing).
- Provide funding mechanisms for the development of affordable housing units.
 Affordable housing in the private market is steadily disappearing, either going offline because of its age or being updated and converted to luxury units. Investments in housing, like those in the president's American Jobs Plan, are needed to rebuild the stock of affordable housing in the private market and backlog of capital needs to restore public housing. These investments are not only needed in underserved urban communities but also in rural and tribal areas.

Conclusion

The pandemic is first a health crisis, but the remedy to curtail transmission relied heavily on social distancing and staying home, reminding us of the importance of housing. Unfortunately, the country's housing infrastructure and safety net have been long neglected and stressed beyond measure, leaving far too many people unprotected. We have long lived with the shame of homelessness and serial evictions, and I hope we now can see the devastating impacts of continued disinvestment in housing. As the vaccination rates rise and the country begins returning to normal, we have an opportunity to redefine that normal. Let's not make homelessness a part of our future. Research clearly shows that the adoption of universal housing vouchers could bring significant and far-reaching benefits. First and foremost, it could end homelessness. But it could bring the additional benefits of reducing poverty and racial disparities, helping landlords, and providing stability to markets. It is for these reasons I support the adoption of universal housing vouchers.

²⁹ "Housing Choice Voucher (HCV) Mobility Demonstration," US Department of Housing and Urban Development, accessed September 28, 2020,

https://www.hud.gov/program_offices/public_indian_housing/programs/hcv/mobilitydemo.