



RESEARCH REPORT

Public Housing Work Requirements

Case Study on the Chicago Housing Authority

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Public Housing Work Requirements: Case Study on the Chicago Housing Authority

The Trump administration has proposed expanding public housing agencies' authority to impose work requirements on working-age, nondisabled people receiving federal housing assistance. There is little evidence, however, about the impact of work requirements on families that receive housing assistance, and none on the impact on public housing authorities' administrative functions or budgets. Work requirement policies, which can be implemented as a condition for receiving housing assistance, can affect low-income households' housing stability, depending on how requirements are structured and implemented. Housing assistance can be at risk if families do not meet their agency's requirement. As these federal policies develop, evidence on implementation and outcomes must be brought to policy debates.

This report presents a case study of the Chicago Housing Authority's (CHA's) work requirement policy, one of a small number of work requirements implemented by housing authorities. Building on a brief that documented knowledge about work requirement policies among public housing agencies generally (Levy, Edmonds, and Simington 2018), this report describes the CHA work requirement, the policy's implementation and how it has changed, and perceptions of implementation and outcomes from key CHA and service provider staff and residents. The CHA work requirement has been in place for nearly 10 years, allowing us to analyze implementation over time and outcomes.

In 2009, CHA began implementing a work requirement for public housing residents, nondisabled and between ages 18 to 54, that mandates they work or pursue education for 20 hours a week, with some exemptions and variations. The requirement is allowable under the US Department of Housing and Urban Development's (HUD's) Moving to Work (MTW) demonstration. HUD has designated 39 of the nation's approximately 3,000 housing authorities as MTW agencies. These agencies have authority to use HUD funds originally designated for public housing operations, capital improvements, and the Housing Voucher Program to implement policies meant to achieve other HUD objectives including improving family self-sufficiency and agencies' cost effectiveness, as well as increasing families' housing choice. Key findings from this case study include the following:

- Roughly 1 in 6 (17 percent) of the CHA’s 30,364 residents were subject to the work requirement in 2017.
- Of the 5,232 residents subject to the requirement, 94 percent were in compliance: 54 percent (2,811 residents) met the work requirement; 23 percent (1,225 residents) were in “safe harbor,” a status which gives residents 90 days to find employment or complete other qualifying activities to comply with the work requirement; and 17 percent (876 residents) were exempt. Roughly 6 percent of eligible residents (320 residents) did not comply with the policy in 2017.
- The household-level average annual income per person subject to the work requirement increased from \$11,568 in 2010 to \$12,712 in 2017, in 2017 constant dollars, but remains low income. If and to what degree the work requirement caused this increase in income is unclear.¹ This analysis could not isolate confounding factors such as a decline in unemployment across the Chicago region, the city’s minimum wage increase, or the economic recovery from the Great Recession.
- Case management and workforce development services are key components of CHA’s implementation of the work requirement policy. Services include assessments and individualized case management, access to job fairs, youth employment programs, career coaching, and referrals for job training and continuing education.
- CHA views the work requirement policy as a mechanism for expanding employment and education rather than a tool for eviction or for residents to increase income enough to move from housing assistance to market-rate housing. Instead, noncompliant households may be placed in safe harbor and referred to a participating service provider.
- Property managers in mixed income developments set the number of hours residents subject to the work requirement must work each week, and are part of a team that enforces the work requirement. Consequently, there is variation among mixed-income developments.
- Interviews with residents and CHA staff reflect the perspective that most residents subject to the policy already work or want to work.
- Residents identified a lack of access to affordable, reliable child care as a challenge for finding and retaining employment, along with challenges posed by temporary, seasonal, or contractual jobs that offer few benefits and minimal job security.

BOX 1

Case Study Methodology

Findings are based on analysis of CHA data and 24 in-depth interviews conducted in the spring of 2018. We interviewed eight CHA staff from resident services, public housing, housing choice voucher divisions, the accounting department, and coordinators overseeing the CHA-contracted workforce services, FamilyWorks. We also interviewed five service staff from agencies contracted by CHA to deliver FamilyWorks services. The study includes perspectives of 11 residents on the policy and its efficacy in promoting work and access to workforce development services. These residents lived in one of three types of assisted housing, all located on the south side of Chicago: a public housing development, a mixed-income development, and scattered-site units. Staff from FamilyWorks offices posted fliers in common areas of housing developments and in their offices to recruit residents for interviews. We screened interested residents and conducted site visits in spring 2018. (See appendix A for additional details on methodology.) At that time, seven resident respondents were employed, two of whom also were attending school; one was in school and not working; and three were not working or in school.

We augment findings from qualitative data with administrative data on work requirement monitoring provided by the CHA. The CHA administrative data covers all residents for 2010 through 2017. These records are from CHA's files on the characteristics of families in assisted housing and from the Yardi System that tracks household compliance. The quantitative analysis identifies residents' work requirement compliance over seven years to better understand the characteristics of CHA residents subject to the work requirement and their earnings over time. (See appendix C for additional details on the CHA administrative data, including data limitations.)

Background on Work Requirements

The Trump administration and Congress have introduced, expanded, or proposed work requirements for recipients across several federal safety net programs. Work requirements generally mandate that recipients engage in job search, job training, education, employment, or community engagement activities as a condition of program eligibility, though requirements vary widely across programs (Falk, McCarty, and Aussenberg 2014; Hahn et al. 2017). Work requirements have long been included in Temporary Assistance for Needy Families, or TANF (federal cash assistance), and the Supplemental Nutrition Assistance Program (SNAP, formerly known as food stamps), and Congress and the Trump administration have sought to expand the SNAP work requirements. In 2018, for the first time, states could receive federal waivers to implement “community engagement requirements” in Medicaid.

Arkansas was first to implement work requirements for its Medicaid recipients, among a wave of states receiving approval for or considering such requirements. Work requirements also have been implemented by public housing agencies (Hahn et al. 2017), but the only published research on the impact of work requirements for households receiving housing assistance comes from a multiyear study of one public housing agency in North Carolina (Frescoln et al. 2018; Webb, Rohe, and Frescoln 2016). We are not aware of any previous analyses on the effects of work requirements on housing authority administrative functions or budgets.

Work Requirements in the MTW Demonstration

To date, work requirement policies for housing assistance are implemented only by public housing agencies operating under the MTW demonstration. Since the late 1990s, HUD has designated 39 of the nation’s approximately 3,000 housing authorities as MTW agencies. MTW agencies are allowed the financial and regulatory flexibility to establish policies such as work requirements; MTW allows participating agencies to use HUD funds originally designated for public housing operations, capital improvements, and vouchers to implement policies focused on family self-sufficiency, cost savings for public housing agencies, and increasing housing choice (Abravanel et al. 2004). Traditional public housing agencies do not have this authority.

As of 2015, 9 of the 39 MTW agencies had an explicit work requirement policy. (See appendix B for information on the agencies with work requirements.) The policies vary across housing agencies, which is expected given the flexibility that MTW allows agencies in tailoring policies to the local context, but there are commonalities. All policies focus requirements on nonelderly, nondisabled adults and exempt some groups of residents. Specific groups exempted from the requirement, the age ranges for adults subject to work, the weekly or monthly work hours required, and the specific activities that qualify as “work” vary (appendix B). Seven of the nine agencies apply their work requirement to households renting on the private market with a housing choice voucher, six agencies implement their requirement for all public housing developments in their portfolio and all voucher households, and three agencies target their policy to a portion of their developments and voucher households. Finally, all nine agencies offer a mix of case management and supportive services to help residents meet the work requirement (Levy, Edmonds, and Simington 2018).

Our prior analysis suggested that only a small share, 10 percent or less, of the tenants served by the nine agencies with a work requirement policy are subject to the requirements (Levy, Edmonds, and Simington 2018). The Center on Budget and Policy Priorities found that only 6 percent of households

receiving rental assistance (approximately 261,000 households) across the nation would be subject to work requirements if the policy were implemented across all such households. This small percentage shows that many households receiving public housing assistance have members who are elderly or have a disability (57 percent), are already working (29 percent), or are unable to work because of caretaking responsibilities (5 percent; Fischer 2016).

Little research is available on the implementation of work requirements in assisted housing. The only major study to date focuses on the Charlotte Housing Authority's policy in North Carolina. The agency implemented its policy in 5 of its 15 public housing developments. This research compares employment and eviction rates between residents living in the developments subject to the work requirement and a comparison group of residents from other developments where the policy was not in effect (Webb, Rohe, and Frescoln 2016). The study found that the policy decreased the number of households paying the minimum rent (a proxy for increased income), increased employment among residents who engaged with case management, and had mixed outcomes for the number of hours households worked weekly. The share of residents working more than 25 hours a week increased after the agency began enforcing its work requirement policy. The report found no increase in evictions and a modest increase in the rate of positive move outs because of gains in income attributed to compliance with the work requirement policy. A subsequent study that examined self-reported health and well-being outcomes found mixed effects associated with the agency's work requirement policy (Frescoln et al. 2018); it found that residents wanted to work, and that increases in income decreased stress. Increased income, however, reduced benefits residents received from Medicaid or SNAP. The work requirement did not have an observable impact on physical health.

The Work Requirement Policy for Chicago's Public and Mixed-Income Housing

HUD granted CHA Moving to Work authority in 2000. In 2009, CHA implemented a work requirement that affects certain residents of public housing and mixed-income developments, which are composed of housing units with differing levels of affordability, typically with market-rate units and units subsidized below market rate for low-income residents (US Department of Housing and Urban Development 2003). The policy is included in residents' leases as an occupancy requirement.

Residents ages 18 to 54 who do not have a disability or are not the primary caretaker of a child or other adult in the household are required to work or engage in an education program for a certain

number of hours each week. Residents who are 17 years old and not in school are also subject to the work requirement. Households on the agency's waiting list for a housing unit must meet the work requirement to sign a lease. Public housing residents who are subject to the work requirement policy must work or be in school for a minimum of 20 hours a week. In some mixed-income communities, where property management sets the number of hours required through an established and approved tenant selection plan, residents must work 30 hours a week.²

Though the policy is mandatory, it includes several exemptions and variations. For example, public housing residents with children younger than 5 receive a child care exemption. In some mixed-income communities, this exemption is available only for residents with children younger than 1. Residents who lived in either of two CHA developments, Cabrini-Green and West Haven (formerly Henry Horner Homes), and were leaseholders before policy implementation in 2009 also are exempt from the work requirement because of stipulations of consent decrees regarding the redevelopment at both locations.³ Finally, Puerto Rican households displaced by Hurricane Maria in 2017 were exempted, in accordance with HUD requirements related to national emergencies.⁴

Residents who are subject to the policy but do not meet the requirement initially are placed in “safe harbor” or given a hardship exemption. Safe harbor gives a resident 90 days to find employment or other qualifying activities to become compliant with the work requirement. When a CHA property manager assigns a resident to safe harbor, a referral is sent to CHA's case management services provider, FamilyWorks (box 2). FamilyWorks is responsible for promptly reaching out to the resident, developing an action plan, and connecting the resident with work-related services. Though the work requirement is a lease requirement, resident participation in FamilyWorks services is voluntary (Popkin 2016). If a resident does not meet the work requirement at the end of the 90 days, safe harbor can be renewed to allow more time to seek employment or education. There is no limit to the number of times a resident engaged with FamilyWorks can renew safe harbor. In contrast, hardship exemptions are granted to residents managing health and personal circumstances that prevent them from working, such as waiting for a disability determination or managing long-term medical issues. Property managers make both safe harbor and hardship designations.

BOX 2

FamilyWorks

FamilyWorks, the family coaching (also referred to as case management) and services program CHA provides to residents, began in 2008. Before 2008, CHA operated an earlier iteration of the program known as Service Connector. For FamilyWorks, CHA's office of resident services contracts with seven agencies across the city to provide family coaching and services. FamilyWorks agencies are assigned to specific geographic regions. Since FamilyWorks's inception, six of the seven service providers have remained consistent, but the geographic areas providers serve have shifted.

All seven agencies operate under performance-based contracting focused on resident outcomes including increased employment, youth engagement in services, and college preparation activities. CHA liaisons monitor the FamilyWorks agencies for compliance, provide information about the work requirement and other lease policies, and notify FamilyWorks of any changes in those policies. The service agencies train their staff on all lease provisions, including the work requirement policy, and any policy changes.

FamilyWorks services are intended to improve residents' lives in four areas: housing and lease stability, education, earning power, and economic independence. Residents' participation in FamilyWorks services and programs is voluntary, and action plans are supposed to be driven by the wants and needs of the resident client. FamilyWorks frontline staff typically first meet residents as they move in and inform them of their services, including work supports such as employment search and transportation assistance, referrals to education and training classes, and a transitional jobs program. If a resident is referred to FamilyWorks by a property manager for noncompliance with the work requirement policy, the FamilyWorks provider must make three attempts to engage with the resident within 30 days of the referral. These attempts are usually made in person through a home visit, but staff will use text messages or telephone calls if scheduling challenges make meeting with the resident difficult.

The CHA work requirement policy does not apply to the agency's voucher portfolio, except for a small number of voucher recipients from the CHA's reentry and mobility pilot programs. The reentry pilot began in 2016 and targeted 50 people who had been convicted of crimes that would otherwise make them ineligible for CHA housing based on current CHA policy. The reentry pilot supports people forming their own household or rejoining a CHA household. People targeted for the reentry programs could be placed in public housing or receive a housing choice voucher. For those receiving a housing choice voucher, only the person reentering is required to meet the work requirement; other members of the household are not. People targeted for the mobility program were on the waiting list for a public

housing unit but were offered a housing choice voucher for a Mobility Area instead.⁵ Participants in each pilot program, regardless of housing assistance type, had to be working at program entry.

Policy Modifications

A few modifications to the work requirement policy have been proposed and implemented since 2009. The first was decreasing the maximum age of those subject to the requirement from 61 to 54. This change was made to align the policy with the age of entry into senior-specific housing developments, ensuring that residents of those developments would be exempt from the work requirement. Other changes that CHA has approved but not yet implemented include

- doubling safe harbor duration from 90 to 180 days, and
- making it mandatory for residents in safe harbor to participate in FamilyWorks services.

At the time of the site visits, CHA was developing guidelines for property managers and FamilyWorks providers to implement the changes. These policy shifts were proposed to address challenges with policy implementation and enforcement. The change to extend safe harbor intended to minimize administrative burden related to the monitoring and recertification of safe harbor and to allow residents more time to become compliant. As a CHA staff member explained:

For the time frame for safe harbor, three months was often not enough time to seek additional employment. And that is really where we are focused. If they were trying to find a job, we were finding that they would continue to go to the property manager, and with the volume of responsibilities the property manager has in addition to this, we found that it was an inefficient use of time. Putting it at 180 days achieved both things. It took a little bit of administrative burden off of our property managers, and it allowed ample time for somebody to have a plan.

CHA will make participation in FamilyWorks services mandatory for all residents in safe harbor at the request of the resident leadership—public housing residents elected to sit on CHA’s Central Advisory Council. A CHA staff member involved in the discussions about this change described the leadership’s perspective: “The mandatory services...actually was a request from our resident leadership saying that, ‘People continued to do safe harbor after safe harbor, and they’re not engaged. And, if they are supposed to be doing something, we really need to enforce it.’ And so we decided to put in mandatory services.” Even though residents and CHA and FamilyWorks staff members consistently said that most public housing residents were already working or want to work, a FamilyWorks staff member also thought the voluntary nature of services and the ability to remain in safe harbor negatively affected services engagement. Another CHA staff member paraphrased messages received from resident leaders about enforcement and the need for mandatory services because residents were not engaged

until they were in trouble: “You say you require these things, but you never follow through...And then when a family is in trouble, your FamilyWorks program comes in at the 11th hour, and they should be there from the very beginning.”

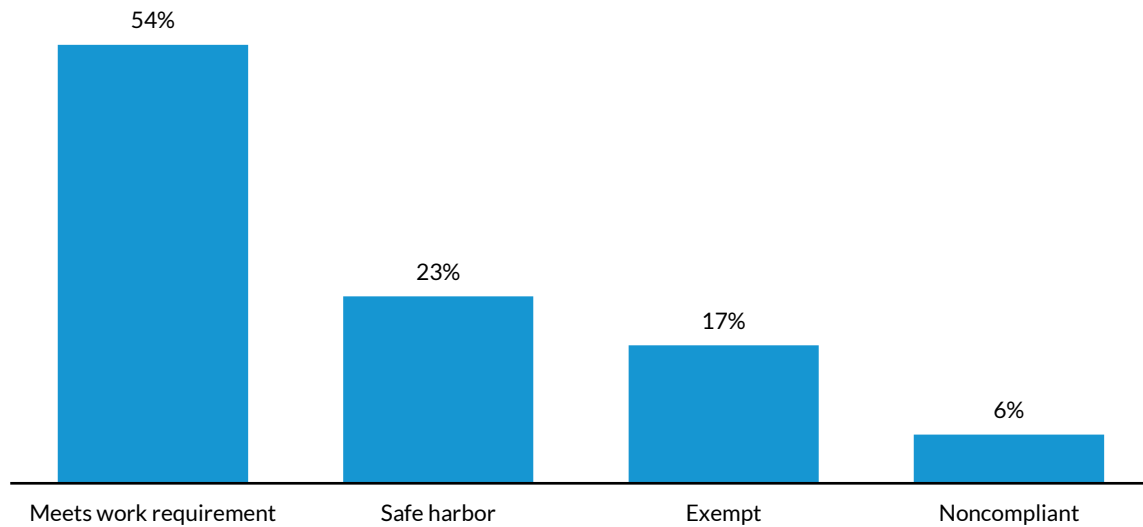
Share of Residents Subject to and Compliant with the Work Requirement Policy

As of 2017, CHA had approximately 17,516 public housing units, including units in mixed-income developments and scattered-site properties.⁶ More than 30,000 Chicagoans live in public housing.

Based on data from CHA, 5,232 residents, or 17 percent of all 30,364 public housing residents, were subject to the work requirement policy in 2017. Of the 5,232 residents subject to the requirement, 2,811 (54 percent) met the work requirement in 2017, as shown in figure 1. Another 1,225 (23 percent) were in safe harbor, and 876 (17 percent) were exempt. Most exemptions were based on disability; only 15 percent of exemptions were temporary for public housing residents caring for children under the age of 5.⁷ Six percent (320 eligible residents) were not in compliance with the policy. Among these residents, 177 (3 percent) were documented as noncompliant, and 143 (3 percent) were engaged in a legal process for a lease violation. CHA actions for lease violations are not necessarily related to the work requirement. CHA staff and FamilyWorks providers said that no one had been evicted for noncompliance with the work requirement, but some people evicted for other lease violations also had not complied with the work requirement.

FIGURE 1

Compliance Status among Residents Subject to the Work Requirement in 2017



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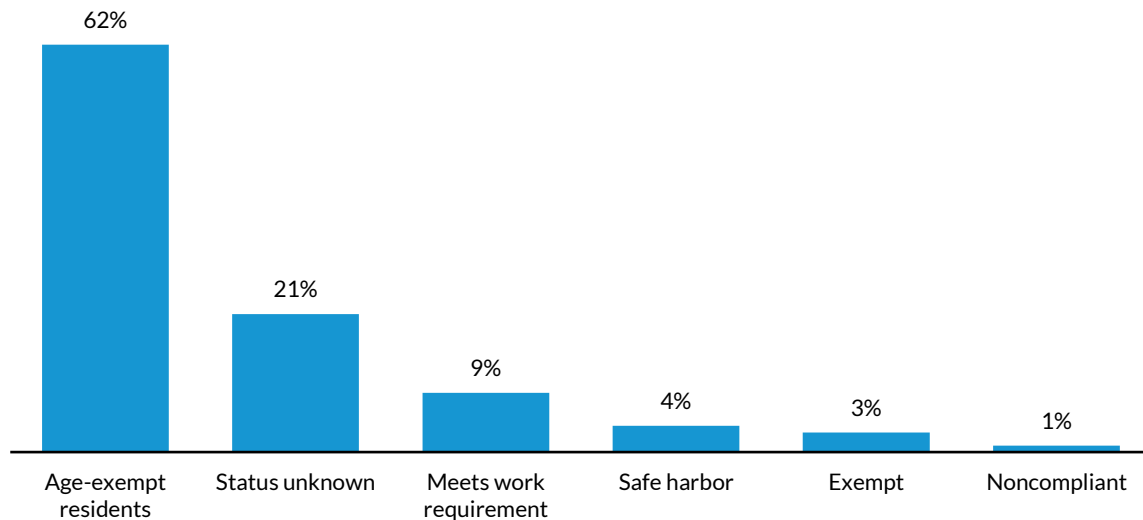
Source: 2009–17 Chicago Housing Authority administrative data.

Note: N = 5,232.

Among all 30,364 CHA public housing residents, approximately 1 percent were noncompliant in 2017, as shown in figure 2. This percent is based on the combined numbers of residents who were documented as involved in a legal process for a lease violation or who CHA identified as generally noncompliant. Most residents (62 percent) were exempt from the work requirement because of their age (i.e., children under age 17 or adults over age 54). An additional 21 percent of residents had no clear compliance status, because they did not appear in the work requirement report file.

FIGURE 2

Work Requirement Compliance Status among All Public Housing Residents in 2017



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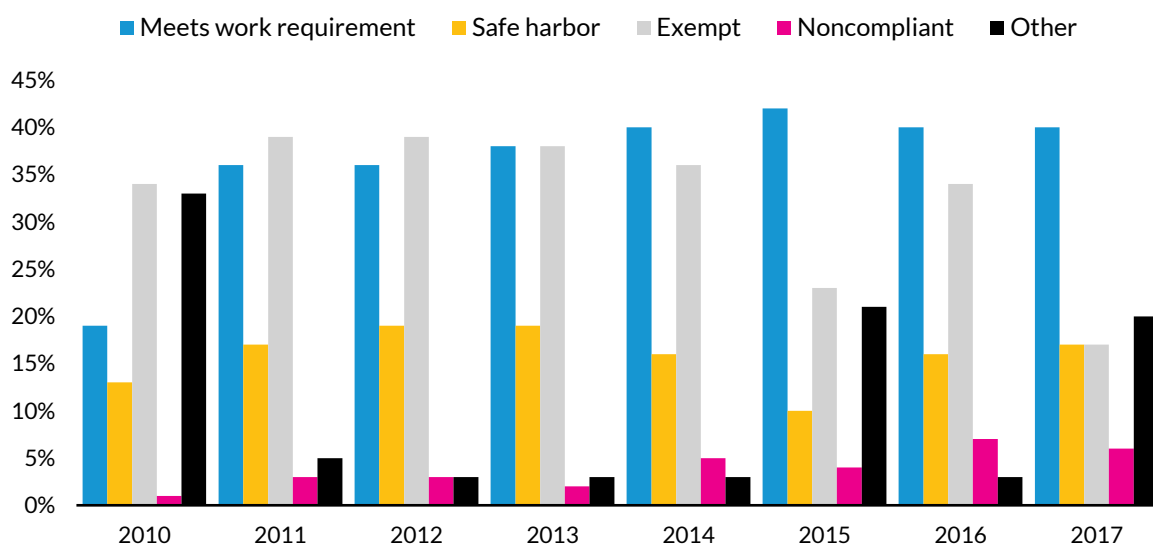
Source: 2009–17 Chicago Housing Authority compliance administrative data.

Notes: N = 30,364. “Status unknown” reflects the missing data for residents whose dates of birth in the resident data file do not qualify them for an age exemption but who are absent from the work requirement file. See Appendix C for details on the data limitations.

Compliance Over Time

The share of households that meet the work requirement appears to have held steady at around 40 percent since 2011, after an increase between 2010 and 2011 during the recovery from the Great Recession (figure 3). Data suggest that the share of households in safe harbor has varied somewhat between 2010 and 2017, as has the share with exemptions. The share of noncompliant households, identified as noncompliant or in legal proceedings for lease violations, has remained somewhat steady. Because of data inconsistencies between the work requirement report files and the resident data files, however, we are unable to determine whether any of the apparent differences in compliance status shown in figure 3 are statistically significant. Year-to-year comparisons largely reflect issues with data reporting rather than changes in compliance status.⁸

FIGURE 3
Household Compliance Status, 2010–17



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Source: 2009–17 Chicago Housing Authority compliance administrative data.

Notes: This analysis only includes residents accounted for in both the work requirement report files and the resident data files each year. Accordingly, each year reflects different people and numbers of observations. “Other” represents households with differing compliance statuses, with one or more members in compliance and one or more members noncompliant. In 2010, “other” also includes households whose compliance status is listed as “missing” in the work requirement report file.

Resident and Staff Perspectives on the Work Requirement Policy

CHA and FamilyWorks staff said the work requirement intends to promote resident self-sufficiency and stability. They do not anticipate that the policy will lead to big enough increases in earnings, whether from increases in the hours worked or in pay, for families to move off housing assistance. One CHA staff person summarized this well, saying, “Having a work requirement is not for the goal of having people leave subsidized housing. The nine years we’ve been doing this, we have not seen people on a trajectory that would suggest that they are making enough money to pay market-rate rent. The goal is to create health in the family and health in the community—economic health and hope and things like that.”

Staff members viewed the work requirement as a tool to help residents improve their circumstances. A staff person from CHA said, “First and foremost, it is an engagement philosophy. It really is about taking persons who are 18 to 54, who are able bodied, and pushing [them] towards engagement and work. Both employment, training, education. It’s fostering a sense of hope and opportunity.” A staff person from a FamilyWorks agency expressed a similar perspective saying, “It’s not just working, there are other barriers people have to eliminate to be workable...It also may be

overcoming barriers—mental health needs, substance abuse issues. Providing support around all those areas as well.”

In contrast to the agency respondents’ views, residents we interviewed talked about the work requirement as a way of limiting the amount of housing assistance they received. Their perspective was that CHA wants residents to increase their income so they can pay more toward rent and not “take advantage of” subsidized housing. Many residents believed CHA wanted people to make enough money to exit public housing and make room for households on the agency’s waiting list. Though residents’ and staff members’ perspectives of the requirement’s purpose differed, most commented that the work requirement was not used as an eviction tool.

Most CHA and FamilyWorks employee interviewees said they thought residents had a clear understanding of the work requirement policy and its purpose. Based on our interviews, residents appear to understand the work requirement, including the option for complying by attending school or other training programs, but their knowledge of enforcement procedures and compliance specifics varied. All residents interviewed could explain the policy generally. As one person succinctly put it, “If you live here, you’ve got to be working, going to school, or doing something on that front. I think [the hour requirement] is between 30 and 40 hours, and that’s a week.” Several residents did not know the actual number of hours they were required to work. Others were unclear about the eviction process and thought that FamilyWorks acted as a liaison on their behalf with property management if there is a lease violation. Interviews with FamilyWorks staff suggest that that case managers do not intercede or advocate on behalf of residents with the property managers regarding lease violations but instead encourage residents to approach property managers when they experience a change in income or other changes that could affect the terms of the lease or rent payment. CHA and FamilyWorks staff may be overestimating how well residents understand the policy and its specifics, particularly the hour requirements and enforcement procedures.

Policy Implementation

Monitoring and Enforcement

Property managers are responsible for managing and enforcing all lease provisions, including the work requirements by which residents of public housing and mixed-income developments must abide. For residents of public housing, property management staff under contract with CHA handle lease

compliance, whereas property management companies handle compliance for households living in the agency's mixed-income developments.

Monitoring for compliance with the work requirement primarily occurs during the standard annual recertification process, when residents update household income and other information to confirm their eligibility for housing assistance and determine their rent amount. Property managers collect proof of employment (pay stubs) or participation in an approved education or workforce development program for each resident subject to the requirement. Residents who work seasonal or temporary jobs must provide a letter from their employer confirming their work hours. Property managers also monitor compliance during interim recertifications, through which residents may request a rent adjustment because of a decrease in income or a job loss between annual recertifications.⁹

Property managers flag residents as noncompliant if they are unemployed at recertification or if they request a rent adjustment because of a loss of income or employment. The managers refer these residents to a FamilyWorks service provider. Upon finding that an eligible resident is not working the required number of hours or participating in an approved activity (school, job training), property managers decide whether to grant the resident safe harbor status or a hardship exemption from the work requirement. FamilyWorks providers, CHA resident services staff, and, for mixed-income properties, contracted property managers track households known to be noncompliant—those not engaged in work activity, not in safe harbor, and not exempt—on a weekly basis through a shared spreadsheet. They meet in person monthly to discuss households not adhering to lease terms, including those not in compliance with the work requirement provision. Because the determination of work requirement compliance takes place through the recertification processes, however, a property manager may not know a household is noncompliant. In such a case, a household would not be flagged as noncompliant or be included in the monthly reviews. It is possible that these residents could be accessing services from FamilyWorks. FamilyWorks staff indicated they encourage residents to inform property managers when they are not meeting the terms of the requirement, but the staff do not inform property managers when this is the case.

Many interviewed staff members and residents noted that property managers monitoring compliance with the work requirement look for evidence of a good-faith effort by residents to seek work, attend job-readiness trainings or workshops hosted by FamilyWorks, or otherwise meet the terms of the requirement. Several CHA staff members said it is unlikely that a household would be denied safe harbor or evicted solely because it failed to meet the work requirement. Noncompliance, however, may be considered a secondary factor for more stringent enforcement actions when households have other lease violations. A FamilyWorks agency staff member said she did not “know of

any [evictions] for the work requirement,” but she knew of “evictions for [criminal activity] and nonpayment of rent.” Based on interviews with CHA and FamilyWorks staff, policy enforcement seems to vary across property managers. According to a CHA staff member, “All of the [enforcement] burden is on the property managers, and they don’t do it consistently.”

Services

FamilyWorks provides resources and supports intended to help residents become and remain employed, including family needs assessments, family coaching, case management services, and an array of on-site programming and referral services for children, youth, and seniors. CHA and FamilyWorks staff clarified that the work-related services are not limited to residents subject to the work requirement and would be available even without the policy. Nevertheless, they see the services as essential to the success of the requirement. Participation is voluntary, including for those working to comply with the policy.

Work supports include career coaching activities, such as interview preparation and résumé development, assistance with signing up for child care vouchers, vouchers for purchasing work clothes, and transit fares for getting to and from work until a new hire receives a first paycheck.¹⁰ FamilyWorks providers can refer residents to education and training programs and the Transitional Jobs program if appropriate. Transitional Jobs combines time-limited, wage-paid work with supportive services for those who have long periods of disconnection from the labor market. FamilyWorks also facilitates job placement by hosting hiring fairs and clubs. These periodic events are organized so that job seekers can apply for jobs and immediately interview with employers who can offer same-day hiring. FamilyWorks also manages CHA’s partnership with the local community college system and trades training programs. The partnership offers free tuition to enrolled residents, after financial aid. One CHA staff member described FamilyWorks, saying, “You have to have services and programs to help support [residents’ efforts]. If we didn’t have FamilyWorks, or we didn’t have workforce development programs, I don’t know how you would implement [the requirement], quite honestly.”

CHA and FamilyWorks staff also noted that the diversity of services offered, including those not directly related to employment, was essential for addressing barriers to employment, such as residents’ concerns over the well-being of their children and limited education or job training among the adults. As a FamilyWorks staff member put it, “Clients come with an array of other issues. There are other things that impact employment too.”

Coordination with Other Safety Net Programs

Some portion of residents subject to the CHA work requirement also are subject to work requirements for other safety net programs.¹¹ Respondents from CHA and FamilyWorks noted that many residents receive TANF and SNAP benefits.¹² Despite this, CHA and other safety net programs do not seem to coordinate. Our interviews suggest that CHA did not try to align the terms of its work requirement with those of other programs. FamilyWorks providers said they help residents apply for other benefits, including SNAP and TANF. CHA staff also noted that residents can provide the documentation of employment or education activities required by TANF to their property manager as proof of compliance. When asked whether they experienced any challenges navigating the work requirements for housing and other safety net programs, residents who received benefits from at least one other safety net program said they had not.

Perceived Outcomes

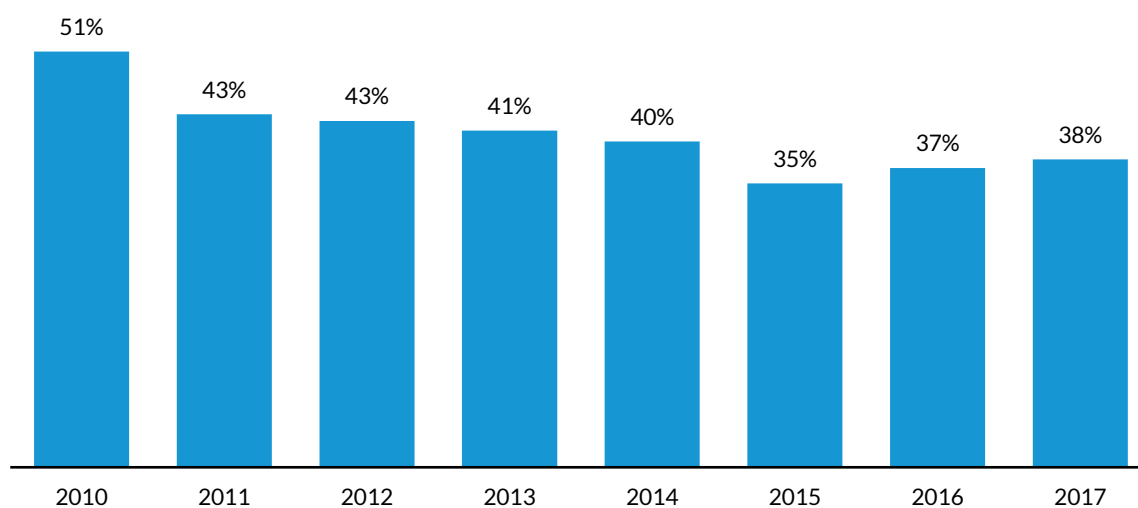
Employment and Income

Residents and CHA and FamilyWorks staff overwhelmingly said that most public housing residents subject to the work requirement policy are already working or want to be employed. Among the small number of residents we interviewed, those who were or wanted to be employed said they had always worked as adults, and the policy did not influence their employment decisions. Staff thought the employment rate has increased over time because of the policy. One FamilyWorks staff member summarized a theme we heard across interviews when discussing the relationship between the work requirement and residents' employment: "People want to do better. They want to work. They want money. They want to buy their children things. They also don't want to be evicted."

A growing share of households earned income since the policy's implementation (including residents not subject to the work requirement). This change in income could be from wages or other sources such as a pension. Among households subject to the work requirement, 51 percent had no wage income in 2010, which declined to 38 percent in 2017 (figure 4). These data, which exclude residents CHA declared exempt from the requirement, indicate that more people are working. The decrease in number of residents with no source of wage income and changes in annual income likely are related, at least in part, to recovery from the Great Recession (Carnevale, Jayasundera, and Gulish 2016). Though we cannot quantify the magnitude of the recovery's impact on residents' employment, unemployment

dropped in the Chicago metropolitan statistical area from 12.2 percent in January 2010 to 4.7 percent in December 2017.¹³

FIGURE 4
Households with No Source of Wage Income, 2010–17



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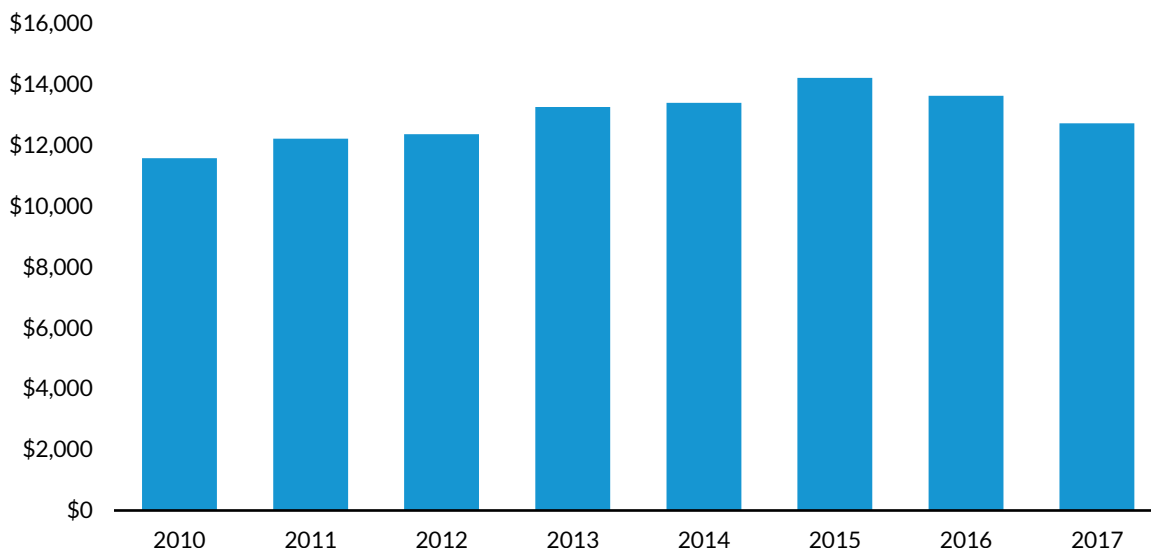
Source: Chicago Housing Authority administrative data.

Notes: This analysis only includes residents whose data appear in both the work requirement report files and the resident data files and excludes residents who CHA declared exempt in the work requirement report files. Accordingly, each year reflects different people and numbers of observations. The change in reporting between 2010 and 2011 may contribute to the decrease in no-wage households.

Based on analysis of CHA’s administrative data, the average annual household income per person subject to the work requirement increased after the policy went into effect.¹⁴ Average annual income increased from \$11,568 in 2010 to \$12,712 in 2017, in constant 2017 dollars, after reaching \$14,205 in 2015 (figure 5). Nearly all households (98 percent) remained low income.

FIGURE 5

Household-Level Average Annual Income Per Person Subject to the Work Requirement



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Source: 2009–17 Chicago Housing Authority compliance administrative data.

Notes: All household income figures are adjusted for inflation to reflect 2017 constant dollars. The numerator includes all household income for all household members, including wage income and nonwage income such as Supplemental Security Income, social security, unemployment benefits, and Temporary Assistance for Needy Families. The denominator is the number of people per household subject to the work requirement. This analysis only includes residents whose data appear in both the work requirement report files and the resident data files and excludes residents who the Chicago Housing Authority declared exempt in the work requirement report files. Accordingly, each year reflects different people and numbers of observations.

CHA and FamilyWorks staff’s opinions differed on whether average resident wages had risen because of the requirement (because it led to higher-paying jobs or increased work hours), or because wages increased across the city and the region because of economic recovery from the Great Recession and the city’s increased minimum wage.¹⁵ One FamilyWorks staff member thought that marginal increases in wages were caused by residents accessing better-paying jobs, saying, “[Wages] have gone up. We were a little shy of \$11. This year, up over \$12. I see an increase in wages. It isn’t a huge jump, but it’s an increase. I know minimum wage has gone up, but people are getting higher[-paying] jobs.”

Most residents are employed in the service sector, according to FamilyWorks staff, though job types vary across the agency’s housing developments. The residents we interviewed, who lived in neighborhoods on Chicago’s south side, said they currently or previously worked in health care, security, or retail jobs. FamilyWorks staff also noted that construction trades and food service are common among residents across developments. As residents and staff discussed residents wanting to work or, among the employed, to get a better job with more hours, higher wages, and a career path, they also mentioned barriers to accessing quality jobs or career advancement.

One of the major barriers to employment and job advancement was a lack of child care, especially during the job search. A resident who is the primary caretaker for her grandchildren and was looking for work described the challenge:

A lot of us are single parents, and they don't offer any child care if we are looking for work. It's only after we get a job [that we can access the subsidized child care], but it's hard to look for work like that.

—CHA resident

Staff also noted that residents with persistent challenges staying employed often need mental health or domestic violence survivor services.

Some working-age residents who are exempt from the policy because of a disability or serious health issue also expressed interest in finding a job. We spoke with a few residents who wanted to work but needed flexible work hours to accommodate their health needs or a work site that complied with the Americans with Disabilities Act. A resident who uses a wheelchair had signed up for CHA's Family Community Ambassador program, which allows residents to earn a rent credit by helping with tasks such as distributing informational flyers door to door throughout a CHA development. Ultimately, she could not participate in the program because the building's elevators were unreliable, posing mobility and safety problems.

Residents working in certain jobs must navigate the challenges of being temporary, seasonal, or contractual workers with limited access to benefits and minimal job security. One resident who works two jobs noted that neither job offers benefits, and her schedule fluctuates over the year because one job is seasonal work at a baseball stadium. She described her jobs and how she gets by:

I've worked at the stadium for five years at a concession stand. It's seasonal work, Friday [through] Sunday, at \$15.03 an hour. Through FamilyWorks, I got a second job at a pizza place that I've had for a year and a half. I work four hours a day [for] five days a week [at] \$11 an hour to help fill my schedule, and when it's not baseball season, I move to full time...I don't have benefits at either job. I'm covered for now, but money is tight during off season. But my son's dad helps out, and I live with my sister, and she has a 15-year-old son who watches [my son] when I need help. We make it work.

Policy Efficacy and Impact

As noted, CHA and FamilyWorks staff members said that no residents had been evicted because of the work requirement alone.¹⁶ Staff thought that residents were aware the work requirement was not enforced to the point of eviction, with one FamilyWorks interviewee saying, “Nobody has ever been evicted for not meeting the work requirement. People know that. People have been evicted for other things—not paying rent and housekeeping cases.” Residents confirmed this was the case; no one knew of any evictions based on noncompliance with the work requirement. Opinions differed, however, on the possibility of such enforcement. When asked about evictions, one resident stated, “I don’t think CHA would [evict because of work requirements] because there are so many loopholes. You would have to do some very drastic things to get kicked out.” But another resident living in the same development thought differently: “If you’re not working, [CHA] will start a process to put you out.”

Despite varying perceptions of enforcement and the risk of eviction, residents thought the policy was fair, and that it was right to ensure people did not “take advantage” of their housing. However, some residents found it frustrating to have the CHA determine the number of hours residents should work. According to these residents, the CHA should take a nuanced view of residents’ circumstances and allow the work requirement to be modified when appropriate. For example, residents thought that the number of school-age children in a family should be considered when setting the number of hours a person must work. One resident who works 15 to 20 hours a week because of inconsistent scheduling over the year explained:

Yes, I think the policy is fair, but as guidelines. They should look at each household’s circumstance. I have four kids in school, and since my mother passed away last year, I don’t have much of a support system if I’m late on rent when I don’t get enough hours [at work]. When that happens, I receive a notice from the property manager, I get it paid just a little late, and they know that, but it doesn’t change how they operate.

—CHA resident

Administrative and Cost Considerations

The CHA does not track staff time and resources spent on policy implementation, monitoring, and enforcement separately from other costs, because services and oversight are provided to residents

regardless of the work policy. No staff members are dedicated solely to the work requirement policy. Likewise, because family coaching and workforce development services and supports are available to all residents, CHA does not distinguish which of these costs are tied to the work requirement policy. Services can be and are accessed by compliant and noncompliant residents alike. Additionally, though CHA spends administrative time convening and coordinating check-ins with FamilyWorks providers and property managers to review noncompliant resident cases, check-ins are not specific to work requirement cases; the reviews focus on residents identified as not complying with the lease for any reason. Interviews with FamilyWorks staff indicated residents not meeting the work requirements tended to also be out of compliance with other lease provisions. CHA also supports work requirement implementation by providing regular updates on any policy changes through CHA liaisons to FamilyWorks providers and by maintaining Yardi Systems, the property management software, and Salesforce, FamilyWorks's case management software. Costs for these activities are not unique to the work requirement, however, because they are necessary for communicating all policy changes and tracking all household, lease, and services information. Consequently, we could not analyze costs associated with the work requirement policy.

One measure of work requirement success would be an increase in the portion of rent households pay, or their total tenant payment. A CHA staff member said that total tenant payments had increased and believed the increase related to increases in employment or wages, though it is unclear whether these changes have resulted from work requirements or improvements in the economy. Another staff member, however, thought the amount of any such change was inconsequential to the agency's budget of more than \$1 billion.

Conclusions

The CHA's work requirement policy has been in effect since 2009 for nondisabled residents ages 18 to 54 who live in public housing and mixed-income properties. CHA views the requirement, implemented as a lease provision, as a tool for increasing residents' work efforts and minimizing barriers to employment through a range of services and supports. Noncompliance with the policy, as monitored by property managers, has not led to resident evictions because of the agency's safe harbor provision. Residents in safe harbor are referred to a FamilyWorks agency and offered opportunities to work toward compliance. In addition, CHA staff felt it was unlikely that a judge in Cook County would entertain an eviction case based solely on the noncompliance with a work requirement. CHA staff did

not think that compliance led to sufficient income gains to support positive moves from housing assistance, though they believe the requirement has led to some positive outcomes.

Certain elements of the requirement have been modified since it was first implemented, such as reducing the maximum age of those subject to the requirement from 61 to 54. Additional changes are forthcoming, including increasing the duration of safe harbor and making participation in FamilyWorks services mandatory for residents in safe harbor.

Based on the analysis of qualitative and CHA administrative data, residents' work participation and income have increased, though the degree to which the gains can be attributed to the work requirement is unclear. Positive outcomes may be attributable to recovery from the Great Recession and an increase in Chicago's minimum wage. Cost implications of the policy for the CHA proved difficult to explore because the agency has integrated work requirement implementation, including service provision, with standard CHA practices.

This study has several limitations. We spoke with a small number of residents from one public housing development, one mixed-income property, and one scattered-site property (see appendix A). Given staff discussions of the variations in policy implementation and the large number of residents served by the CHA, we have captured a small slice of residents' experiences. We were also unable to interview property managers from the mixed-income properties. They fill an important role in policy compliance monitoring and enforcement, so this gap is significant.

Nonetheless, the study raises questions about the possibility of work requirements increasing the work effort and income among assisted households to a level that enables self-sufficiency and positive moves from housing assistance. Even with the city's increased minimum wage, CHA staff have not yet seen such outcomes. The work requirement may be associated with increased work effort, but we cannot determine if the work requirement caused increased work effort. Determining the effects of the housing agency's work requirement compared with improvements in the economy and the city's increased minimum wage was beyond the scope of this qualitative case study. The CHA's plan to make participation in FamilyWorks services mandatory reflects staff and resident leaders' perspectives that the services are important for increasing residents' work engagement, and that more needs to be done to motivate and support noncompliant residents' work efforts. Whether mandatory services as part of increased enforcement leads to improved employment and self-sufficiency is yet to be known.

Appendix A: Methodology

Our study used several data sources. To begin, we reviewed literature on work requirements in public housing, CHA's recent MTW annual reports and plans, and HUD's Picture of Subsidized Housing public data focused on age, disability, and income status. We then conducted two site visits to interview CHA staff, FamilyWorks contractors, and public housing residents. We also received internal administrative data from CHA.

Working with CHA's director of resident services, we organized interviews with relevant staff in Chicago. Next, with CHA's permission and FamilyWorks's facilitation, staff from FamilyWorks offices posted resident recruitment fliers in the targeted public housing development (Dearborn Homes) and the FamilyWorks offices that serve residents living in the area bounded by 35th Street and Garfield Boulevard, State Street to the west, and Cottage Grove Avenue to the east. CHA selected this area because it includes public housing and mixed-income and scattered-site properties, which maximized researchers' interview time and minimized travel during the three-day site visit. The flier requested that residents interested in being interviewed about the work requirement policy call a provided number and receive more information and an interview screening. In two weeks, Urban received over 30 calls, identifying 19 residents eligible for interview. From the screened respondents, researchers selected residents who represented diverse experiences relevant to the policy. As shown in table A.1, selection criteria included (1) employment status (working, not working and in safe harbor, attending school or training); (2) caring for school-age children (over age 5); (3) between ages 18 and 51; and (4) household characteristics (public housing, scattered-site property, mixed-income).

We coded interview notes according to a codebook with themes and issues we identified before collecting data. We analyzed coded segments to tell the story of the CHA's work requirement policy and provide context for administrative data findings. Following initial qualitative data collection, CHA shared administrative data on work requirement compliance to inform Urban research. The data cover all residents for 2009 through 2017. These records are from CHA's 50058 files on the characteristics of families in assisted housing and from the Yardi System that tracks person-level household compliance.

TABLE A.1

Interviewee Characteristics

	Number of interviewees (N = 11)
Employment status	
Working full time	2
Working part time	3
In school and working	2
In school	1
Not working or in school	3
Caring for school-age children	5
Age	
18-28	4
29-39	4
40-50	3
Household characteristics	
In public housing	6
At scattered-site property	2
Mixed-income	3

Source: Chicago Housing Authority administrative data.

Appendix B: Features of MTW Public Housing Authorities' Work Requirement Policies

Housing authority	Policy implementation date	Targeted programs	Household members affected	Hour requirements and work definitions	Work support services
Atlanta Housing Authority	2005	Public housing, voucher	Nonelderly, nondisabled household members ages 18 to 61	Head of household: work 30 hours a week Other nonelderly, nondisabled adults: work or participate in school, job training, or part-time employment for 30 hours a week	Case management services
Housing Authority of Champaign County	2013	Public housing, voucher	Nonelderly, nondisabled household members ages 18 to 54	All household members: work 20 hours or more a week or enroll full time in a training or educational program that offers a certificate	Case management services
Charlotte Housing Authority	2013	Public housing	Nonelderly, nondisabled household members (no age specified)	Head of household: work 15 hours a week, increasing to 30 hours Other adults: work a minimum 5 hours a week, increasing to 10 hours	Case management and supportive services
Chicago Housing Authority	2009	Public, mixed-income, and scattered-site housing	Nonelderly, nondisabled household members ages 18 to 54 and those age 17 not attending school full time	All household members: work 20 hours a week or participate in employment-related activities (job training or educational programs that help obtain employment)	Case management services and workforce development programs
Delaware State Housing Authority	2000/2013 ^a	Public housing, voucher	Nonelderly, nondisabled household members (no ages specified); voucher holders porting into Delaware from another housing authority	All household members: work or participate in training or education program for 20 hours a week (Tier I Work Requirement); work 30 hours a week (Tier II Work Requirement)	Case management services

Housing authority	Policy implementation date	Targeted programs	Household members affected	Hour requirements and work definitions	Work support services
Lawrence-Douglas County Housing Authority	1999	Public housing, voucher	Nonelderly, nondisabled household members ages 18 and older	All household members: work, seek work, or participate in training or educational programs leading to work for 15 hours a week One adult in two-parent households with minor children: work 35 hours a week	Educational and training opportunities, funding for training
Lexington Housing Authority	2014	Public housing	Nonelderly, nondisabled heads of household (no age specified)	Head of household or spouse: work 37.5 hours (Self-Sufficiency I) or 20 hours (Self-Sufficiency II) a week	Mandatory case management
Louisville Metro Housing Authority	2007	Public housing and vouchers in the Clarksdale HOPE VI scattered-site units	Nonelderly, nondisabled household members (no age specified)	All household members: work 20 hours a week; requirement may be waived temporarily for full-time students enrolled in an accredited postsecondary educational institution	Mandatory case management
Housing Authority of the County of San Bernardino	2010	Public housing (in Maplewood Homes), voucher (for ports into county)	Nonelderly, nondisabled household members ages 18 to 61	All household members: participate in work-related activities (work or activities removing barriers to employment) for 15 hours a week	Pilot included resident service coordinator support and partnership with the county workforce development board; no services for voucher ports

Source: "Moving to Work (MTW) – Participating Sites," US Department of Housing and Urban Development, accessed April 9, 2019, https://www.hud.gov/program_offices/public_indian_housing/programs/ph/mtw/mtwsites.

Note: ^a Delaware State Housing Authority has two tiers of work requirements that were implemented separately.

Appendix C: Data Limitations

CHA provided separate annual records on public housing residents (resident data files) and public housing residents' compliance with the CHA work requirement (compliance files) for each year from 2009 to 2017. The resident data files and the compliance files share some common identifying information, such as residents' full names and dates of birth, but each contains distinct data: resident data files do not contain any data on compliance, and the compliance files do not contain data on income, children, or seniors who fall outside of the work requirement's age limits. This means that data from both files are necessary to fully respond to questions linking compliance with household characteristics (e.g., income source).

Mismatches between the resident data files and compliance files significantly reduced the scope of questions our analyses can answer confidently. Below, we provide greater detail on the three primary data problems we encountered and our strategy for analyzing the data.

Issue 1: Public Housing Residents with No Compliance Data

In any given year, one-quarter or more of public housing residents ages 17 to 54 do not appear in the compliance files (table C.1). We could not determine why data were missing. Without knowing the source of the discrepancy, it is unclear whether records missing from the compliance files reflect bias, and if so, how the data may be biased.

TABLE C.1

People Ages 17–54 in Resident Data Files Versus All Records in Compliance File

Year	People ages 17–54 in resident data file	Total records in compliance file
2010	15,711	10,994
2011	15,449	8,524
2012	11,961	8,534
2013	11,862	8,620
2014	11,808	8,299
2015	11,746	8,273
2016	11,275	8,322
2017	11,468	5,233

Source: Chicago Housing Authority administrative data.

Issue 2: Poor Matches between Resident Data and Compliance Data

In 2010 and 2011, the compliance files included many unique records that did not appear in the resident data files (table C.2). Though most years' mismatches resulted from records in the resident data files not appearing in the compliance files, 2010 and 2011 saw thousands of records only in the compliance file. We could not determine the cause of this discrepancy.

TABLE C.2

Mismatches in Resident and Compliance Data

Year	People ages 17–54 in resident data file	Unique records only in compliance files
2010	15,711	4,517
2011	15,449	3,573

Source: Chicago Housing Authority administrative data.

Issue 3: Lack of Data for Matching across Datasets

Available data that match across both data sources to uniquely identify residents is minimal, and the available data vary by year. Unique identifiers like social security numbers only appear in some years' compliance data; data from 2015 and 2017 lack social security numbers. Moreover, resident data files from 2011 to 2017 only have social security numbers for the head of household, and that number is assigned to all household members; we encountered the same problem with tenant IDs. Though we combined available data—full names, birth dates, tenant IDs, and social security numbers—to match people across the datasets, the lack of a clear person-level, administrative identifier prevented us from merging data.

Notes

- ¹ Our calculation of household-level average annual income per person is adjusted for inflation and includes all household income (including wage income and nonwage income such as Supplemental Security Income, social security, unemployment benefits, and TANF) from all household members as the numerator. The denominator is the number of people per household subject to the work requirement. We include only residents whose data appear in both the work requirement and resident data files, excluding residents who CHA declared exempt, as indicated in the work requirement files.
- ² The work hour requirements across all mixed-income developments were unavailable at the time of this study.
- ³ *Henry Horner Mothers Guild v. Chicago Hous. Auth.*, 824 F. Supp. 808 (N.D. Ill. 1993) and *Cabrini-Green Local Advisory Council v. Chi. Hous. Auth. No. 13 C 3642* (N.D. Ill. 2014).
- ⁴ CHA interview conducted in April 2018.
- ⁵ CHA's Mobility Areas are any Chicago Community Area with 20 percent or less of its families with income below the poverty level and a reported violent crime count below the median (normalized by the Community Area's total population). Some Community Areas with improving poverty and violent crime rates along with significant job clusters are also designated as Mobility Areas.
- ⁶ "Assisted Housing: National and Local," US Department of Housing and Urban Development, accessed April 3, 2019, <https://www.huduser.gov/portal/datasets/assthsg.html>.
- ⁷ It is not clear whether the exempt designation includes hardship exemptions because CHA data were not broken out in a way that allows that determination.
- ⁸ We could not test significance of changes in compliance status over time because thousands of people ages 17 to 54 appeared only in the public housing resident files, which have no data on work requirement compliance status. The extent of missing data may indicate significant bias. Additionally, underlying structural changes in how data were reported over time, such as the addition and deletion of compliance categories, would further reduce the validity of a significance test. For example, the noticeable increase in residents meeting the work requirement between 2010 and 2011 reflects shifts in data reporting. See appendix C for details on data limitations.
- ⁹ A CHA staff member monitors compliance for the small number of housing choice voucher households subject to the work requirement.
- ¹⁰ This study did not assess the quality of work resources and supports.
- ¹¹ Available data did not support identifying residents who are subject to other safety net programs' work requirement policies.
- ¹² The SNAP program in Illinois is often called "Link," which is the name of the electronic benefits transfer card that program beneficiaries use to purchase food.
- ¹³ "Unemployment Rate in Chicago-Naperville-Elgin, IL-IN-WI (MSA)," Federal Reserve Bank of St. Louis, accessed April 3, 2019, <https://fred.stlouisfed.org/series/CHIC917URN>.
- ¹⁴ Household income includes all sources of income from all household members. We include wage income and nonwage income, such as Supplemental Security Income, social security, unemployment benefits, and TANF, in these calculations.
- ¹⁵ The city of Chicago raised its minimum wage of \$8.25 to \$11.00 in 2017. The minimum wage will rise to \$13.00 in 2019.
- ¹⁶ We do not have administrative data with sufficient detail to confirm this.

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