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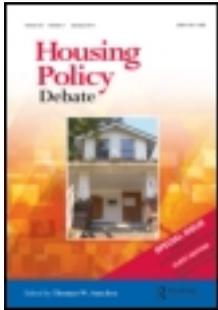
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## Housing Policy Debate

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### The Community Development Block Grant Program Turns 40: Proposals for Program Expansion and Reform

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## GUEST EDITORS' INTRODUCTION

### The Community Development Block Grant Program Turns 40: Proposals for Program Expansion and Reform

William M. Rohe<sup>a\*</sup> and George C. Galster<sup>b</sup>

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The CDBG turns 40 this year. Thus, it is an appropriate time to take stock of this important program and consider how it can be improved. The purpose of this article is to introduce what we believe to be 6 key issues that must be addressed if the program is going to live up to its full potential. Those issues concern: the continuation of the program and funding levels; the formula for allocating funds to participating jurisdictions; the specification of the population groups targeted; the spatial targeting of funds; the program's role in furthering fair housing; and performance measurement. Each of these issues is discussed and the authors offer their recommendations for improving the efficiency and equity of the program.

**Keywords:** Federal housing policy; Community Development Block Grant Program; Neighborhood revitalization

The Community Development Block Grant (CDBG) program was enacted by Congress in 1974 after a remarkable, idiosyncratic set of political forces coalesced, as documented by Orlebeke and Weicher (this issue). CDBG represented a fresh approach to helping cities and towns provide low-income citizens with decent housing in a suitable living environment. It replaced eight separate categorical programs that supplied funds for improving water and sewer systems, developing open space, conducting urban-renewal activities, expanding public facilities, and more. Rather than having to apply separately to each of these programs, the CDBG program offered local communities both a greatly simplified application process and a predictable allocation of funds from year to year. Moreover, those funds could be used to undertake a wide range of community improvements, as long as they could be justified under one of the three program objectives: benefiting low-income people, preventing or eliminating slums and blight, or addressing urgent needs. Congressional appropriations for the program were allocated to grant recipients based on formulae that included measures of poverty, age and overcrowding of the housing stock, population, and growth.

Since its passage, the CDBG program has provided more than \$130 billion to cities, urban counties, and rural areas. The larger "entitlement" cities and urban counties receive direct funding, while smaller towns and rural counties are eligible to receive funds provided to the states, which then distribute those funds to local jurisdictions (Wiley, this issue). By statute, 70% of the allocated funds go to entitlement communities, while 30% go to the states for distribution. Since 1993, the CDBG program has also been used as a

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vehicle for delivering special congressional appropriations to communities affected by disasters (Fox, this issue; Spader, this issue). Moreover, Section 108, the loan-guarantee provision of the program, allows entitlement jurisdictions to obtain loans to fund large economic-development projects by pledging future CDBG allocations as collateral (Wiley, this issue).

After 40 years, the CDBG program remains the primary federal source of funds for urban-improvement initiatives. Although its funding has been sharply reduced since its apex in 1978, it still distributes billions of dollars each year to over 1,200 cities, counties, and states. As Rich (this issue) illustrates, CDBG is remarkable for its longevity and the durability of its basic structure and rules. Program advocates argue that it allows local jurisdictions freedom to meet their unique needs and undertake comprehensive, rather than piecemeal, revitalization efforts. They also argue that the block grants provide local jurisdictions with a degree of funding certainty, which allows them to focus on doing the work (rather than chasing the funds) and to make long-term commitments both to their staffs and to their public and private partners. It is also credited with reducing reporting and administrative burdens. Perhaps most critically, it sometimes has been used strategically to leverage substantial improvements in low-income neighborhoods (Galster, Tatian, & Accordino, 2006; Galster, Walker, Hayes, Boxall, & Johnson, 2004; Pooley, this issue).

Not everyone sees the CDBG program in such a positive light. Critics of the program argue that program participants are not accountable, leading to the waste and misuse of program funds; that the program is inadequately targeted to the communities that need it the most; and that politicians use the program as a political tool for their reelection (DeHaven, 2009; Malanga, 2010; *Misuse of HUD*, 1993). Moreover, analyses of the program by the Congressional Budget Office and the U.S. Department of Housing and Urban Development's (HUD's) Inspector General have found fault with program administration, particularly with the lack of evidence on program outcomes (Office of Management and Budget, 2006; *Bringing Communities into the 21st Century*, 2006). For these and other reasons, the Bush Administration, in 2006, proposed folding the program into a larger block grant to be administered by the Department of Commerce Rich (this issue). This proposal was scuttled, however, by vigorous opposition from mayors and community-development advocates across the country. These and the other challenges that the CDBG program has faced since its inception are discussed by Rich (this issue). Yet, many of the issues raised by the critics linger. Given that 2014 is the 40th anniversary of the CDBG program, this is an opportune time to take stock of the program's evolution, accomplishments, shortcomings, and potential, as well as to propose program changes needed to better address the needs of low- and moderate-income (LMI) communities in the 21st century.

The intention of this article is to highlight and evaluate what we believe to be the six key issues related to the CDBG entitlement program, thereby providing an overarching framework for the contributions made by the other 10 papers comprising this special issue of *Housing Policy Debate*. Those issues are:

- (1) Should the CDBG program be continued, and if so, at what level of funding?
- (2) How should the program funds be allocated to different jurisdictions?
- (3) To what population groups should the funding be directed within jurisdictions?
- (4) Should the funding be spatially targeted within jurisdictions?
- (5) What should be the role of the program in furthering fair housing?
- (6) How should the performance of the program be measured and monitored?

After reviewing the literature on the CDBG program, we argue that program expansion, coupled with more targeting at all geographic scales, plus enhanced HUD oversight are needed. We understand that aggressive targeting might undermine political support for the program and that it is important to allow jurisdictions flexibility in the use of CDBG funds, but we think the primary goal of the program should be to assist LMI persons in the places where they are most concentrated. Hopefully, that can be done in a way that also yields improvements to the economy and quality of life of the participating communities. We consider each of these six issues in the following sections.

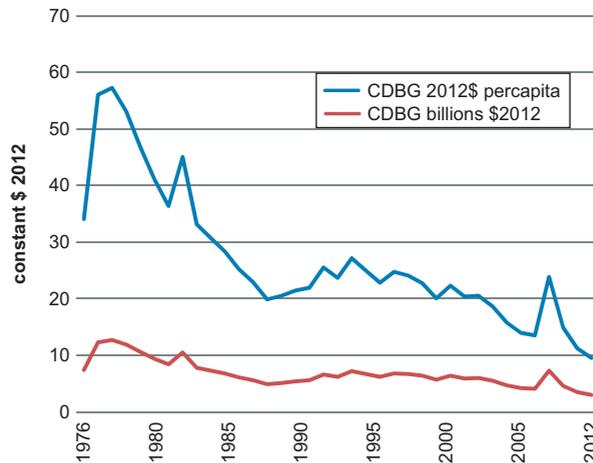
### **Should the CDBG Program Be Continued, and If So, at What Level of Funding?**

In order to establish the appropriate context for the amount of funds that should be devoted to CDBG nationally, it is helpful to review the historical context out of which the Housing and Community Development Act of 1974 arose. The dominant public-finance concept of the era was “fiscal imbalance.” Increasingly the federal government had an easier time raising revenues to meet its obligations, but just the opposite was the case for states and (especially) localities. Walter Heller, chairman of the Council of Economic Advisers under presidents Kennedy and Johnson, famously observed that as older American cities deindustrialized in the decades following World War II and had concomitant increases in social problems, there was a growing mismatch between local needs and the fiscal capacity to meet these needs. His pithy summary of the situation was that “the prosperity of the 1950s and 1960s brought the nation affluence but the cities effluents” (Peterson, 1996, p. 206). Daniel Patrick Moynihan, President Nixon’s special assistant for urban affairs, proclaimed that each 1% increase in GNP yielded a 1.5% increase in federal tax revenue but only a 0.5% to 0.75% increase in municipal tax revenue because of the dependence on income taxes at the federal level and on property taxes at the local level (Peterson, 1996). There was broad, bipartisan consensus that the federal government should restore fiscal balance by sharing more of its revenues with local governments, although there was debate over whether this new federal aid should take the form of categorical grants or unrestricted transfers (Orlebeke & Weicher, this issue). It was in this heady context that CDBG became law.

Today it is hard to imagine that federal aid to cities grew an average of 14.7% annually from 1965 to 1970 and 22% annually from 1970 to 1973 (Peterson, 1996). Federal aid to the cities from all sources peaked in 1978 as President Carter argued that more federal policy needed to focus on city problems. Ironically, the California property tax–limiting ballot measure Proposition 13 passed that same year, heralding a nationwide “taxpayers’ revolt” and Republican emphasis on fiscal retrenchment, thereby consigning the notion of federal urban policy via fiscal redistribution to the policy scrapheap. Any vestiges of the earlier political consensus based on fiscal imbalance dissolved completely in the 1980s with President Reagan’s emphasis on revenue restrictions and tax cuts at the federal level.

Federal revenues shared with states and particularly local governments declined by over a third from their 1978 peak to 1983 (Peterson, 1996). Although President Reagan’s proposals for even more radical cuts were tempered by Congress, a more traditional allocation of functions among federal, state, and local governments was restored. Local governments, once encouraged to assume more responsibility for dealing with social problems, now retrenched, and states were again by default given stronger roles in deciding how these problems would be addressed, if at all.

Figure 1. CDBG expenditures since program inception.



*Note.* From “Public Budget Database: Budget Authority,” by the U.S. Office of Management and Budget (available at <http://www.whitehouse.gov/omb/budget/Supplemental/budauth/xls>), and “Resident Population Data,” by the U.S. Bureau of the Census (available at <http://www.census.gov/2010census/data/apportionment-pop-text.php>).

The trend of federal withdrawal from the funding of social programs that addressed urban problems continued with the Republican-dominated Congress elected in 1994. Block grants of all types were reduced, some previous entitlements were converted into block grants to states and capped (e.g., Medicaid), and others were radically transformed (e.g., Aid to Families with Dependent Children). These changes further devolved to states the responsibility for administering programs of vital importance to cities, but also reduced federal support for doing so. It remains to be seen the degree to which this trend will be altered by the implementation of the new healthcare laws.

Not surprisingly, given these changes, CDBG has contracted significantly over time. Since its first appropriations in fiscal year 1976, the inflation-adjusted (constant 2012 \$) allocations to CDBG peaked at \$12.7 billion (\$57 per capita) in 1978 (see Figure 1). They have steadily declined since, to \$3 billion (\$10 per capita), with the minor exception of a slight upswing in 2009 from stimulus monies being channeled through the program. CDBG spending is now worth less than a fourth of what it was in 1978, measured in inflation-adjusted terms (approximately a sixth, measured in inflation-adjusted per capita terms).

We recommend that CDBG program funding be significantly expanded and, as explained in the next sections, targeted in a more focused fashion at several spatial scales. We believe that restoring the real value (adjusted for inflation) of the program exhibited at its 1978 peak would represent an appropriate goal.

This recommendation of CDBG expansion in conjunction with more focused targeting should be pursued for reasons of economic efficiency and equity. From an efficiency standpoint, there is substantial evidence that a disproportionate share of the nation’s social problems are generated in communities with concentrations of poverty (Brooks-Gunn, Duncan, & Aber, 1997; Dreier, Mollenkopf, & Swanstrom, 2004; Galster, 2002) and that substantial gains in social well-being (i.e., Pareto improvements) could potentially be gained by reducing this phenomenon (Galster, 2007). Concentrations of poverty also result in substantial reductions in residential property values (Galster, Cutsinger, & Malega, 2008) and, by implication, local property-tax bases. Thus, perversely, the jurisdictions that

most need to address problems associated with concentrations of poverty are the least financially capable of doing so. They are the most prone to slipping into a vicious downward spiral of mutually reinforcing increases in tax rates, erosion of public services, population and job loss, and tax-base erosion. The 2013 bankruptcy of Detroit, Michigan, is emblematic of this dynamic, which creates not only intolerably unfair contexts for our neediest citizens but also milieus yielding disastrous consequences for the larger society. Therefore, substantially increasing the quantity of tightly targeted dollars flowing into communities of concentrated poverty would be a wise investment of federal funds, fostering substantial social rates of return as well as enhancements in social justice.

### **How Should the Program Funds Be Allocated to Different Jurisdictions?**

Debates on the targeting of CDBG program funds focus on three geographic levels of targeting. They focus on the degree to which program regulations:

- (1) provide the appropriate share of funds to the communities (see [Collinson, this issue](#)).
- (2) target funds to the appropriate people within jurisdictions (see Brooks, this issue).
- (3) target funds to specific neighborhoods within jurisdictions (see Pooley, this issue).

Here we discuss the formulae for targeting of program funds to jurisdictions; this is followed in the next sections by discussions of the other two levels of targeting.

Since its inception, the CDBG program has used two formulae for disbursing funds among qualifying jurisdictions; the jurisdiction may use the formula that provides it with the greater amount. Formula A is based on total population, persons in poverty, and overcrowded households (one or more persons per room). Formula B is based on persons in poverty, lag in population growth since 1960 compared with the national metro average, and housing units built before 1940. The weights of these elements differ slightly depending on the type of jurisdiction; see [Collinson \(this issue\)](#) for details.

Several assessments of the CDBG program have concluded that these formulae are poor at directing dollars toward the neediest jurisdictions ([Collinson, this issue](#); Rich, this issue; Richardson, 2005). In particular, Collinson documents the numerous shortcomings in both Formula A and Formula B allocation algorithms that lead to substantial instances of horizontal and vertical inequity across jurisdictions. This is a major shortcoming of the CDBG program and needs urgent attention. Collinson illustrates the consequences of several alternatives to the current system of allocating CDBG funds across jurisdictions. We are especially attracted to his “concentration” formula, which adds significant weight to the percentage of persons living in tracts where 30% or more are in poverty, because they are the font of our society’s most costly problems, as noted above.

### **To What Population Groups Should the Funding Be Targeted Within Jurisdictions?**

The CDBG legislation and regulations require that grant recipients spend (over a three-year period) at least 70% of their program funds to benefit LMI people, defined as those with household incomes below 80% of the area’s median income. The remaining funds can be used in eliminating slums and blight or addressing urgent needs.

Some may argue that the targeting of CDBG funds beyond these very general targeting requirements should be left to the local political process. But the research on the distribution of CDBG funding indicates wide variation among participating jurisdictions in the extent to which program funds are targeted to the neediest residents. The dominant

approach is for local politicians to spread funds widely in an attempt to curry favor with voters (Brooks & Phillips, 2010; Rich, 1993). Even in jurisdictions with community coalitions that advocate for targeting benefits to the poor, research has found that their efforts were more successful when there was a strong federal role (Rich, 1993).

Studies that rely on data provided to HUD by the grant recipients indicate that upward of 90% of program funds benefit LMI households (Rich, this issue; Walker, Hayes, Galster, Boxall, & Johnson, 2002; Walker et al., 1995). As has been pointed out by several critics, however, these high numbers are a function of HUD accounting rules. In particular, HUD considers all expenditures in areas where 51% of the residents have LMI incomes as benefiting LMI people. Similarly, the full cost of services or facilities and of job creation or retention activities can be counted against the 70% LMI requirement if at least 51% of those benefiting from those activities are LMI.

When researchers recalculate the percentage of funds benefiting LMI people using proportional accounting, those percentages drop substantially (Brooks, this issue; Rich, 1993, this issue; Walker et al., 2002). Rich (1993), for example, found discrepancies as large as 40% between estimates based on HUD accounting rules and those using proportional accounting. If individual grant recipients were to spend all of their grant funds on indirect-benefit categories, as little as 35.7% of the funds could actually benefit LMI people (51% of 70%). To provide more accurate information on LMI benefit, grant recipients should be required to use proportional accounting methods.

Another issue concerning income targeting is the extent to which the program is assisting those at the very top of the LMI income range (say 60%–80% of the local median, versus persons below 60% of the median). Prior research indicates that, indeed, the lion's share of the funds benefit those at higher income ranges (Dommel, Rich, & Rubinowitz, 1983; Rich, 1993). This is at least partially due to the emphasis that many programs place on owner-occupied, single-family housing rehabilitation programs, whose beneficiaries typically have incomes closer to 80% of the local median. Moreover, research on the geographic distribution of CDBG funds within cities shows that CDBG expenditures tend to favor the wealthier districts and/or the wealthier areas within districts (Brooks, this issue). One way to address this issue is to add a second targeting requirement to the CDBG regulations. They might, for example, stipulate that at least 40% of program expenditures benefit those with incomes under 50% of the local median.

### **Should the Funding Be Spatially Targeted Within Jurisdictions?**

As Rich (this issue) documents, as early as 1977, congressional oversight committees worried that CDBG funds were not being sufficiently targeted within communities to produce sizable impacts. This worry escalated during the Reagan Administration's efforts to increase local discretion. The Clinton Administration tried to combat this drift away from targeting by issuing regulations encouraging CDBG entitlement jurisdictions to designate Neighborhood Revitalization Strategy Areas (NRSAs). Unfortunately, since 1995, only 17% of CDBG funds have been spent in NRSAs (Rich, this issue).

Not surprisingly, a recent assessment of the CDBG program concluded that it has demonstrated little effectiveness in revitalizing impoverished communities (Center for Effective Government, 2005). We think that this is primarily due to its lack of geographic targeting. There is long-standing theory and evidence that property owners in distressed neighborhoods require a minimum amount of revitalization investments occurring nearby before they will be convinced to invest their own funds (Kadduri & Rodda, 2004; Quercia & Galster, 1997; Taub, Taylor, & Dunham, 1984; Thomson, 2008). It follows that a

threshold of public investments (e.g., those provided by CDBG) must be exceeded before substantial leveraging can be expected.

This conclusion has been supported by studies of the neighborhood impacts of CDBG-funded revitalization strategies involving a nationwide sample of 17 cities (Galster et al., 2004) and in studies of Richmond, Virginia (Galster et al., 2006) and Philadelphia, Pennsylvania (Pooley, this issue). Collectively, this evidence indicates that around \$100,000 to \$200,000 (inflation-adjusted dollars) must be invested annually for at least three years in a census tract before any noticeable impact and leveraging occurs. Given this, the CDBG program should be reformed to require (or at least provide strong incentives for) more concentrated geographic targeting within LMI communities.

### **What Should Be the Role of the Program in Furthering Fair Housing?**

From the very beginning of the CDBG program, its role in furthering fair housing has been limited. As Pearl (this issue) notes, the original legislation did not include any reference to the program's role in furthering fair housing, although that obligation did apply to all HUD programs. A step forward was taken in 1983, when HUD added a requirement that CDBG grant recipients produce an analysis of impediments (AI) to furthering fair housing. The AI requirement instructs all program participants to identify local impediments to fair housing, to suggest actions to overcome those impediments, and to maintain records on those actions. There was no requirement, however, that the AI document be submitted to HUD. All that local jurisdictions had to do in drawing down funds was to attest that they had done one. Thus, we think it is fair to say that the development of AIs has largely been a paper exercise.

This lack of attention to furthering fair housing was exposed in 2006 when the Anti-Discrimination Center of Metropolitan New York brought suit against Westchester County for what it claimed were false certifications of compliance with the AI requirements. The court found that the county's certifications were false or fraudulent. The terms of the settlement cost the county \$62.5 million and required it to develop affordable housing in predominantly white areas of the county (Anti-Discrimination Center of Metropolitan New York, 2009).

Following the filing of the Westchester County suit, the National Committee on Fair Housing (2008) studied the AI process and recommended a variety of changes, including the development of performance standards and sanctions for those failing to meet them. More recently, the U.S. Government Accountability Office (2010) reviewed 441 local fair-housing plans and found that 29% had not been updated in the past five years; in a more detailed analysis of 60 plans, it found that the vast majority did not include implementation time frames or the signatures of top elected officials as suggested in HUD guidelines. Its report includes recommendations that HUD require jurisdictions to periodically update their plans and submit them to HUD for review.

After 40 years, HUD is on the verge of implementing regulations that would substantially strengthen its oversight of the fair-housing requirements. HUD's proposed regulation would require program participants to develop an assessment of fair housing (AFH) document that would contain analysis of impediments plus goals and strategies for addressing those impediments. Moreover, program participants would have to submit those documents for HUD review prior to the submission of their consolidated plans, and HUD would expect to see the strategies identified in the AFH document reflected in the recipients' consolidated plans and annual action plans. HUD proposes to assist program participants in completing the AFH plans by providing clear goals, data, and templates.

The proposed regulations, even if adopted, stop short of requiring the establishment of specific performance standards and benchmarks. Moreover, HUD's review of AFH documents is limited to whether the program participant has provided the required elements of the AFH—not whether the jurisdiction has complied with its fair-housing obligations. Still, the proposed rule change would be a major step forward in ensuring that program participants are taking their fair-housing responsibilities seriously.

### **How Should the Overall Performance of the Program and of Individual Program Participants Be Measured and Monitored?**

One of the truly vexing issues concerning the CDBG program is how to assess its impacts. Unlike categorical programs, which tend to target a small number of activities, for which clear impact indicators can be developed, the CDBG program's breadth makes its impacts extremely difficult to measure and evaluate in a consistent fashion across jurisdictions. This is particularly true for area wide expenditures such as infrastructure improvements. Even when such activities are concentrated in specific neighborhoods, it is very difficult to attribute any general improvements in the area to the CDBG expenditures in view of the lack of persuasive counterfactuals and ability to control for other activities in the area.

In spite of these obstacles, HUD has worked hard to get participating communities to report on both the uses of CDBG funds and the outcomes of those expenditures. HUD requires participating communities to use its Integrated Disbursement and Information System (IDIS) to track and draw down program funds, and to record both the types and outcomes of activities funded. Program participants are asked to designate whether the funds are spent on a range of activities—in categories such as housing, economic development, public infrastructure, and public services and to record accomplishments, such as the number of homes rehabbed, the number of properties acquired, and the number of persons benefitting from various types of public services and from public improvements.

The information entered into the IDIS, along with program narratives developed by each program participant, is then used to prepare consolidated annual performance and evaluation reports, which detail the purpose for which the funds are being spent and the outcomes. Those reports are made available to the public and used by HUD to prepare its annual report to Congress on the CDBG program.

However, these performance-measurement systems have several limitations. The most obvious is that they rely on local jurisdictions to self-report their program outcomes. Without periodic monitoring, participants are likely to exaggerate the outcomes associated with expenditures (U.S. Government Accountability Office, 2006). Unfortunately, recent staff cuts have severely reduced HUD's ability to conduct such monitoring visits. Also, by HUD's own admission, there is a lack of uniform reporting across program participants. For example, when it comes to reporting the number of persons benefited by CDBG-funded services, some participants report the number of times a service was used, while others report the number of persons who used it. Although the reporting system can certainly be improved, the broad range of activities funded by the CDBG program means that any system will face great challenges in capturing the full benefits of the program. Beyond improved reporting and monitoring, HUD should periodically fund independent assessments of the program. Much of what we know about the performance of the CDBG program comes from independent evaluations, such as those done by Dommel and colleagues (1983) and by Walker and colleagues (1995, 2002). We believe it is time for another broad study of the program and its impacts.

### Conclusion and Recommendations

Over its 40-year history, the CDBG program has helped local jurisdictions improve housing conditions, public infrastructure, public services, and economic opportunities for their LMI residents. The program has played a redistributive role in assisting both the jurisdictions and the individuals with higher levels of need. Like other block grants, however, the CDBG program needs to strike a balance between federal mandates and local discretion. Federal mandates are needed to ensure that local jurisdictions use the funds to accomplish the program's objectives, and local discretion is needed to allow communities to undertake projects that address their unique needs. After reviewing the research literature on the allocation and uses of CDBG funds, we believe that the program would benefit from significant expansion, alterations in selected federal regulations, and greater HUD oversight. In making these recommendations, we are cognizant of the need to maintain both congressional and local political support for the program. Substantial reductions in the number of communities that are eligible to receive funds, for example, might result in the loss of political support and the elimination of the program; thus, we do not advocate that. Specifically, we advocate the following:

- Total federal expenditures for CDBG should be significantly expanded; an amount comparable with the height of program funding in 1978 (adjusted for inflation) is what is needed.
- The formula for allocating CDBG funds to jurisdictions should be altered to target additional funds to the neediest entitlement communities, especially those with higher concentrations of poverty.
- Program rules should be revised to require better geographic targeting of CDBG funds so they better serve LMI populations and so they exceed the reinvestment thresholds needed to leverage substantial private investments.
- Program participants should be required to use proportionate accounting in reporting LMI benefits so as to better target funds to the neediest areas and individuals. In addition, a second-tier social-targeting requirement should be added to the program such that some percentage of program funds (say 40%) has to benefit very-low income persons (those with incomes under 50% of the local median income).
- HUD's proposed new regulations requiring program participants to develop assessment of fair-housing strategies should be adopted as soon as possible and should include metrics and benchmarks, which HUD should monitor over time. HUD staff should have the authority to withhold funds from communities that are not making progress toward achieving those goals.
- HUD needs to continue improving its performance-assessment systems. This will require additional HUD staff to oversee compliance with social targeting, fair housing, and other CDBG regulations. It should also commission a broad assessment of the program's operations and impacts from independent researchers.

We believe that an expanded CDBG program could much better serve the national interest than either the abolition of the program or its indefinite continuation with the current minimal scale, inappropriate regulations, and weak oversight. With such reforms, we would hope that a future special issue of *Housing Policy Debate* might offer a much more favorable appraisal of the program.

### Notes on Contributors

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