12-2014

Examining the Role of Street-level Bureaucrats in the Implementation of an Affordable Rental Housing Policy for Extremely Low Income Households in the District of Columbia

Rod Williams
University of Arkansas, Fayetteville

Examining the Role of Street-level Bureaucrats in the Implementation of an Affordable Rental Housing Policy for Extremely Low Income Households in the District of Columbia

Examining the Role of Street-level Bureaucrats in the Implementation of an Affordable Rental Housing Policy for Extremely Low Income Households in the District of Columbia

A dissertation submitted in partial fulfillment
of the requirements for the degree of
Doctor of Philosophy in Public Policy

by

Roderick T. Williams
University of Southern Mississippi
Bachelor of Arts in Urban Planning, 1998
Georgia Institute of Technology
Master of Science in Building Construction, 2006

December 2014
University of Arkansas

This dissertation is approved for recommendation to the Graduate Council.

Dr. Valerie Hunt
Dissertation Director

Dr. Brink Kerr
Committee Member

Dr. John Gaber
Committee Member

Abstract

The individuals who staff the nation's 4,600 Community Development Corporations (CDCs) represent the front line in production of affordable housing for America's poor. CDC staff members work within chronic funding uncertainties, applying complex and often ambiguous policies, under pressure to address shortfalls in affordable units. As such, they represent a prime example of Lipsky's (1980) street level bureaucrats (SLBs): agency workers with no formal policy role, who nevertheless shape policy by exercising discretion in the course of implementing ambiguous directives under stressful and alienating conditions.

The purpose of this study is to uncover how CDC SLBs experience their work and influence the implementation of affordable rental housing policies for Extremely Low Income (ELI) households in Washington, D.C. Semi-structured interviews and a follow-up survey were conducted with staff members of three Ward 8 CDCs, and interpretive policy analysis was applied to their responses. Analysis indicates that CDC staff members generally view the LIHTC, HPTF, and HOME policies as beneficial, but confusing, and difficult to administer. They view government funders and private developers as either unwilling or unable to fund support services that ELI renters need. There was some evidence of desire for more advocacy-based approaches that harkened back to the CDCs' original mission of community empowerment. On the other hand, support was lacking such goals as maintaining economic and racial diversity as neighborhoods gentrify. Although Lipsky (1980) emphasized the alienation experienced by SLBs, these findings suggest that, in certain contexts, SLBs may experience a positive attachment to their organizations, clients, and mission, even while experiencing frustration with policy ambiguities or inefficiencies.

Acknowledgements

It would not have been possible to write this dissertation without the help and support of the kind people around me, to only some of whom it is possible to give particular mention here.

I would never have been able to finish my dissertation without the help, support and patience of my dissertation chair, Dr. Valerie Hunt, not to mention her advice and unsurpassed knowledge of CDCs and community development. The great advice and support of the rest of my dissertation committee, Dr. Brink Kerr and Dr. John Gaber, has been invaluable on both an academic and a personal level, for which I am extremely grateful.

I will forever be thankful to my former college research advisor and professor, Dr. Rhonda Phillips. Dr. Phillips has been helpful in providing advice many times during my college career. She was and remains my best role model for a social scientist, mentor, and teacher. Dr. Phillips was the reason why I decided to go to pursue a career in research.

Finally, I would like to thank Dr. Margaret Reid, who has also been a great advisor and professor during my time as a doctoral student. Her writing advice proved invaluable. I would also like to thank Dr. Patricia Koski and Ms. Vicky Hartwell. Thank you all for your time, help, and understanding.

Dedication

I dedicate my dissertation work to my family and many friends. A special feeling of gratitude to my loving wife, Dr. Charlayne Hayling-Williams whose words of encouragement and push for excellence ring in my ears. She was always there cheering me up and stood by me through the good times and bad. My loving parents, Verris and Gwendolyn Seals have never left my side and are very special. They were always supporting me and encouraging me with their best wishes.

I also dedicate this dissertation to my brother, Chavel Williams, and my many friends and family who have supported me throughout the process. I will always appreciate all they have done.

Table of Contents

CHAPTER I: INTRODUCTION AND OVERVIEW

Introduction

The National Housing Trust Fund (2011) estimates that there are approximately 10 million extremely low-income (ELI) renters who compete for roughly 6.5 million affordable housing units. Further, the number of affordable rental housing units available to the lowest-income households continues to decline (U.S. Department of Housing and Urban Development [HUD], 2011). As noted in a report on the rental housing crisis, many ELI renters already spend years "waiting in vain" to secure adequate housing (Andrews, 1999). Moreover, over the last two decades, periods of economic prosperity have resulted in the diminished ability of ELI households to secure housing (Andrews, 1998, 1999). Perhaps the most serious consequence of this growing housing shortage is that even more families will continue to become homeless.

In the District of Columbia (hereafter referred to as "the District" or "DC"), ELI renters, whose housing costs exceed 50% of their household income, have less than a 50% chance of gaining access to a safe, decent, and affordable housing unit (District of Columbia, Department of Housing and Community Development [DHCD], 2011). Additionally, from 2001 to 2005, the number of ELI-renter households increased by more than 20% (HUD, 2011). In the District, there are only 37 affordable units for every 100 ELI households (HUD, 2011). Further, the wait for public housing in DC is over five years (Andrews, 1999). More than one-quarter of those who are waiting for public housing live in one particular ward, Ward 8. Because developers of affordable housing and policymakers are failing to adequately address the housing needs of ELI renters, these households continue to struggle to find satisfactory shelter (DCHD, 2011).

Ward 8, which contains the three community development corporations (CDCs) that are the focus of this study, has the District's highest need for affordable housing rental units. As

background, CDCs are neighborhood-based, nonprofit organizations that work to rebuild the social and economic conditions of distressed communities (Vidal, 1995; Walker, 2002) and are best known for their contributions to the affordable housing industry (Vidal, 1995). The CDCs selected for this study are the Wheeler Creek Community Development Corporation (WCCD), Lydia's House, and the Congress Heights Community Training & Development Corporation (CHCTDC). Each CDC focuses on affordable housing as a way to promote community and economic development.

Statement of the Problem

In 2007, the concentration of renter households was 77% in Ward 8, compared to 59% for the District. In addition, more than 60% of Ward 8 renter households have annual incomes below $25,000, while the District average is $44,000 (DCHD, 2011). Moreover, approximately one-quarter of the 26,000 eligible households on the District's Housing Authority's waiting list live in Ward 8 (DCHD, 2011). In addition, Ward 8 exceeds all other wards in terms of the number of affordable housing units and voucher holders.

From Fiscal Year (FY) 2007 to FY 2010, the District invested $389 million in the development of affordable housing (DHCD, 2011). Programs for ELI renters provide for the construction and rehabilitation of low-income rental and ownership units and include the Low-Income Housing Tax Credit (LIHTC), the Housing Production Trust Fund (HPTF), and the HOME Investment Partnerships Program (HOME). These programs are the primary tools used by CDCs in the development of affordable housing.

Affordable housing programs like the LIHTC, HPTF, and HOME often contain ambiguous language (Matland, 1995). For example, housing programs do not specify the exact mix of housing that the CDC must provide. The language simply states the minimum

requirements to receive federal funds. As a result, these programs are subject to broad interpretation by CDC staff and others involved in the creation and preservation of affordable housing. Nevertheless, CDCs that are in the business of creating affordable rental housing for ELI households are subject to these programs.

LIHTC, HPTF, and HOME each mandate the use of public-private partnerships, which require the merging of resources between partners. Housing public-private partnerships were created to help overcome the limited capacities of the individual partners (Stoecker, 1996). Due to the blending of financial and operational resources, public-private partnerships require congruent goals among participants to ensure successful implementation of policy (Vangen & Huxham, 2000). Nevertheless, one of the primary challenges that face CDCs engaged in the development of affordable rental housing is the different goals and values of the partners (Matland, 1995).

Interpretative policy analysis (Yanow, 1996) will provide the analytic framework to analyze how CDC staff – as street-level bureaucrats (Lipsky, 1980) – in the District's view, understand, and implement the LIHTC, HPTF, and HOME programs. An interpretive approach to implementation places an emphasis on context-specific meanings and "brings organizational analysis of implementing agencies within the context of a particular society's values" (Yanow, 1996, p. 18). According to Yanow, street-level bureaucrats actively interpret the rules and regulations that are set by federal policies. As a result, CDC executive staff may convey additional meanings to affordable rental housing programs during the implementation process that are different from the policymakers. Through the theoretical lens of street-level bureaucracy, this multi-case study will uncover the views that some CDC executive staff holds in regard to the implementation of the affordable rental housing programs that are the focus of this study and

how these views affect implementation. This study will utilize data collected from CDC annual reports, media articles, and academic literature, as well as a survey of CDC staff, to illustrate the impact that the attitudes, goals, values and beliefs of CDCs has on affordable rental housing programs.

Background

What is affordable housing?

Affordable housing as a concept is rather difficult to define. In the literature, affordability is generally defined as a household's ability to pay without incurring financial difficulties (Robinson, Scobie, & Hallinan, 2006). However, it is not clear as to how a household decides when they have reached a point of financial difficulty. Furthermore, how should income, spending, or housing quality standards be set, and who should set them? Even so, for the purposes of designing, implementing, and evaluating housing programs – like the LIHTC, HPTF, and HOME – it is necessary to adopt a specific quantifiable and operational definition (Goodman, 2001), yet that definition is lacking.

As there is no single standard definition of affordable housing, the federal definition and affordability requirements of each program were used to evaluate the programs that are a part of this study. Many of HUD's housing programs focus on low-income households. Within this general rule of thumb, HUD further classifies low income into three categories – low, very low and extremely low – based on median income and the fair market rent for each locality.

According the rules for HOME, rental housing qualifies as affordable when rents do not exceed 30 percent of the adjusted income of a family whose income equals 65 percent of the median income for the area with adjustments for the number of bedrooms (42USC12745). In

addition, the rules require that very low-income families who pay no more than 30 percent of the household's monthly-adjusted income towards rent occupy not less than 20 percent of the units.

Developers that utilize the LIHTC program may elect one of two thresholds:

1. 20-50 Rule: At least 20 percent of the units must be rent restricted and occupied by households with incomes at or below 50 percent of the area median income, or
2. 40-60 Rule: At least 40 percent of the units must be rent restricted and occupied by households with incomes at or below 60 percent of the area median income.

For the purposes of examining the implementation of federal housing programs administered through HUD, the most commonly accepted standard of housing affordability – which includes rent and utilities – will be used. HUD's program guidelines states that housing is considered affordable when the household pays no more than 30 percent of their net household income on housing costs. The "Brooke Amendment," which initially set public rental housing payments at 25 percent of their adjusted incomes, was enacted in response to the deteriorating conditions of public housing residents (Bratt, 1986). The amount was raised to 30 percent in 1981 (Milgram, 1993). The following HUD definitions guide the implementation of LIHTC, HPTF, and HOME programs and will therefore be used throughout this study.

1. *Area Median Income (AMI)* refers to the midpoint household income from a metropolitan area or a non-metropolitan county and is used in determining eligibility for housing programs.
2. *Low-income households,* as defined by HUD, are households with incomes between 50.1% and 80% AMI.
3. *Very-low income (VLI) households,* as defined by HUD, are households with incomes between 30.1% and 50% AMI.

4. *Extremely-low income (ELI) households,* as defined by HUD, are households with incomes at or below 30% of the AMI.

Stone (2006) argues that analytical indicators of housing affordability are the foundation on which housing policy can be formulated, implemented, and evaluated. Glaeser and Gyourko (2003) argue that housing affordability problems are more closely related to the costs of production rather than the household's ability to pay. This definition is not applicable to this study for several reasons. The primary reason being that Glaeser and Gyourko argue that income takes a back seat to production costs in determining housing affordability. The ability to pay – thus income distribution – is an essential element of housing affordability.

For this study, Stone's (2006) definition of affordable housing most closely reflects the federal standards that guide the implementation of the policies being examined. Stone states that affordable housing cannot have meaning or be useful unless it answers three essential questions:

1. To whom is the housing affordable?
2. What is the standard of affordability?
3. How long will the housing remain affordable?

Stone (2006) argues that housing affordability in the United States is most relevant when it is based on the relationship between household incomes and relative prices. This is demonstrated in the way eligibility is determined, payments are leveled, and housing affordability is assessed for federally subsidized housing programs.

Of course, housing affordability is but one form of housing depravation. Numerous families in the District currently reside in housing that is considered inadequate. Adequate housing means having access to a safe and comfortable home without the old culture of fear and isolation (Bashir, 2002). According to the literature, many households live in housing that is

overcrowded, in unsafe communities, or inaccessible locations (Stone, 2006; Lerman & Reeder, 1987). The high cost of housing relative to the low affordable housing stock have forced many families to live in overcrowded environments where safety is of daily concern (Department of Housing & Community Development (DHCD, 2011). This study argues that affordable and adequate housing are inseparable. Since the definition of housing affordability – other than the often-used federal definition – is ultimately a value judgment, this study does not seek to resolve that venerable debate.

Alternative Views of the Affordable Housing Problem

How the problem of affordable housing is viewed plays a substantial role in determining ways to resolve the issue. However, research suggests that there is no consensus on either point. This study will outline four schools of thought on the fundamental causes of the affordable housing issue that our nation faces. In addition, each school of thought comes with its own prescriptions for addressing the housing crisis.

First, housing costs are high because of government regulation and modern mass production techniques (Schussheim, 1974; Somerville & Mayer, 2003; and Glaeser & Gyourko, 2003). The regulation approach contends that the supply of affordable housing units is significantly limited due to regulatory restrictions on builders. In a study on the impact that building restrictions have on housing affordability, Glaeser and Gyourko concluded that land-use controls – specifically zoning – are more responsible for high housing costs than lack of supply. The primary prescription from groups within this view of affordable housing is to relax government regulations, like density requirements, to help bring down the costs of housing.

Second, extremely- low and low- income households do not have adequate options in securing affordable housing simply because they are poor and/or discriminated against by others

in society (Schussheim, 1974). Public policy should instead focus on education, skill training, and other programs that are designed to strengthen a household's ability to secure housing in the private market without the substantial government subsidies. Similarly, Robinson, Scobie and Hallinan (2006) argue that household income is a primary factor contributing to housing affordability. Although income is a primary affordability measure, Robinson, Scobie and Hallinan also conclude that other factors such as rent payments and supply constraints are interrelated.

A third, and closely related to the second, view is that extremely-low income households are disorganized and lack the social, political, and financial capitals to control their own destiny (Schussheim, 1974; Faux, 1971; Farmer, 2005). Since the end of the Civil Rights movement in the 1960s, community-based organizations have fought to curb the deterioration of low-income urban communities (Faux, 1971). Still today, a disproportionate number of urban communities are experiencing high unemployment rates, deteriorating infrastructure, and social decline. The primary prescription within this view is community building. The community-building concept is driven by the ability to create and sustain substantive relationships, both within and outside the community. Farmer (2005), in a study on community development in Brooklyn, concluded that community building was the single most important aspect of achieving success in the neighborhood studied.

Fourth, the lack of adequate affordable housing options available to extremely-low and low income households is due to an inadequate supply of income targeted units (Goodman, 2001; Stone, 2006; & Schussheim, 1974). The obvious prescription within this view is to increase the supply of affordable housing units to those whose needs are not met by the private market. The argument is that through the use of various financing mechanisms and direct

subsidies, all households can be adequately housed. This view on the affordable housing issue is the core of this implementation study.

Community Development Corporations

Since the 1960s, the nonprofit sector has relied heavily on the government for significant portions of the funds used to supply affordable housing to low-income households (Moulton & Anheier, 2000). In the early 1980s, however, President Reagan called for substantial cutbacks in federal spending on housing programs (Wylde, 1999). This laid the groundwork for the nonprofit sector's reliance on for-profit organizations to provide affordable rental housing to low-income households. Further, this was the beginning of the partnership approach in the provision of affordable housing.

Thus, in the 1980s, CDCs became the leading provider of affordable rental housing to lower-income households (Pickman, Roberts, Leiterman, & Mittle, 1986). As noted, CDCs are neighborhood-based, nonprofit organizations that work to rebuild the social and economic conditions of distressed communities (Vidal, 1995; Walker, 2002) and are best known for their contributions to the affordable housing industry (Vidal, 1995). Since their inception in the 1960s, CDCs have played an active role in the delivery of housing and social services (Faux, 1971; National Alliance of Community Economic Development Associations [NACEDA], 2011).

CDCs further increased their role in the development of low-income affordable housing when President Nixon announced a moratorium on the construction of new public housing units in 1972 (Walker, 2002). According to Walker, 94% of all CDCs are involved in housing development. Most CDCs develop new units and renovate old, outdated housing (Walker, 2002). Research indicates, however, that CDCs are not as effective as desired by community leaders and

policymakers at providing affordable rental housing to ELI households (Stoecker, 1996; Walker, 1993).

A key challenge for CDCs is to acquire the financial resources for the development and rehabilitation of affordable rental housing in the communities that they serve. Historically, government assistance made it possible for CDCs to remain true to their mission of supplying affordable housing units to ELI households because the government provided subsidies and other funding that was not tied to the public-private partnership model. A lack of sufficient funding for developing ELI housing, however, has forced CDCs to form partnerships with various public and private organizations to accomplish their goal of developing a greater number of affordable rental units for ELI households. Currently, CDCs receive their resources from three primary sources: government funding, private contributions, and fundraising (Crittenden, 2000).

CDCs are designed to work collaboratively with individuals, organizations, and institutions in an effort to achieve their goal to create better services for the community residents. Today, there are more than 4,600 CDCs nationwide (NACEDA, 2011). Despite their growth in numbers, CDCs do not appear to have made significant advances in terms of positively affecting the number of affordable rental-housing units for ELI renters (Bratt, 2006; Schill, 1996).

Federal Housing Policy

Hogwood and Gunn states that "Any public policy is subjectively defined by an observer as being such and is usually perceived as comprising a series of patterns of related decisions to which many circumstances and personal, group, and organizational influences have contributed" (pp. 23-4). The federal government has been legislating and implementing housing policies and programs since the 1930s (McCarty, Perl, Foote, Jones, & Peterson, 2008). Initially, federal policies were designed to assist mortgage holders. It was not until the passage of the U.S.

Housing Act of 1937 that low-income renters received federal assistance (McCarty et al., 2008). Although the federal government still spends billions of dollars annually to address housing affordability issues for low-income citizens, the problem of affordability remains. For example, in the City of Chicago's 1998 housing plan, the researchers noted that most federal programs do not have the capacity to provide the depth of assistance needed to adequately supply affordable housing to ELI households (City of Chicago, Department of Housing, 1998).

For decades the federal government provided direct subsidies to states to create local public housing authorities designed to increase the supply of affordable rental housing for lower-income residents (McCarty et al., 2008). Because of this, the federal government was seen by many as the leader in the provision of affordable housing for lower-income families (Pickman et al., 1986). The federal government decided in the 1980s that decentralization, devolution, and privatization would provide more viable options for affordable housing than the federal government alone could provide (Wylde, 1999).

Research indicates that federal government's retrenchment from developing and managing rental units created a leadership void in the affordable housing market efforts (City of Chicago, Department of Housing, 1998; Pickman et al., 1986). In addition to supplying fewer affordable rental housing units, the federal government also reduced funding and gave more control to local and state governments, causing the affordable rental-housing crisis for ELI households to worsen (Andrews, 1998). Andrews also argues that the situation is further exacerbated by the relaxation of federal income targeting requirements for programs such as LIHTC.

As noted, in the early 1980s, President Reagan's substantial cutbacks laid the groundwork for the nonprofit sector's reliance on for-profit organizations to provide services and

housing to their clients (Pickman et al., 1986; Wylde, 1999). This was the beginning of the devolution of the responsibilities of the federal government to regional, state, or local governments in terms of U.S. housing policies (Smith, 2000). Larger federal subsidies are required to increase the production of affordable rental units for ELI households (Pickman et al., 1986). However, the federal government continues to decrease the number of subsidies and the dollar amount given to address deficiencies in affordable housing (HUD, 2011). Due to this reduction in government funding, many CDCs have been forced to alter their strategies from community building and organizing to fundraising and partnering to secure affordable rental housing units for ELI households (Brathwaite, 2005). Despite CDCs' lack of significant accomplishments in housing production, each year the federal government provides millions of dollars to CDCs for the development and rehabilitation of affordable housing.

Housing Programs for ELI Renters

Low-Income Housing Tax Credit. In 1986, Congress created LIHTC as part of the Tax Reform Act of 1986 (HUD, 2011). LIHTC offers credits against tax liability as an incentive for individuals and corporations to invest in the construction or substantial rehabilitation of affordable rental housing for low-income families. Tax credits have become the single most important source of capital subsidy in the development of affordable rental housing (Cummings & DiPasquale, 1998).

Tax credits are allocated by the federal government to individual states, based upon their populations. In the District, DHDC is responsible for administering and monitoring the LIHTC (DHCD, 2011). Upon receiving their allocation, DHCD is required to distribute the tax credits to the projects that best meet the goals and objectives of the Qualified Allocation Plan, which is an annual plan that establishes the District's selection criteria for how its tax credits will be

awarded. Per federal mandate, housing projects that serve the lowest-income tenants for the longest period are to be given preference. Nevertheless, the gap between supply and demand for ELI renters continues to grow (National Low-Income Housing Coalition [NLIHC], 2011).

HOME Investment Partnerships Program. The HOME program was authorized by Title II of the Cranston-Gonzalez National Affordable Housing Act of 1990 (HUD, 2011). Through this federal block-grant program, HUD allocates approximately $2 billion annually to states and localities for the purpose of improving the housing conditions of low-income households. As with LIHTC, this program also mandates the use of public-private partnerships (HUD, 2011).

HOME is also designed to give the states and localities the flexibility that they need in addressing their local housing needs. With federal funds as an incentive, HOME encourages the partnering of state and local governments, private investors, and nonprofit organizations. Further, the program seeks to increase the capacity of nonprofit organizations to provide affordable housing to low- and very-low income households. To accomplish this, the program requires a 15% annual set-aside for certain nonprofit agencies (HUD, 2011).

Another goal of HOME is to increase the supply of available affordable housing for low- and very-low income households. To receive funding, states or localities must submit a consolidated plan to HUD. Although the policy specifically targets low- and very-low income households, each jurisdiction is responsible for addressing its local needs, which could include ELI households. As noted, the District has a severe shortage of affordable units for ELI households (DHCD, 2011).

Housing Production Trust Fund. The District's HPTF was authorized by the Housing Production Trust Fund Act of 1998, DC Law 7-202 (DHCD, 2011). HPTF is a pool of public

funds for the development and preservation of affordable housing units for District residents. It is administered by the District's DHCD and advised by the Housing Production Trust Fund Advisory Board. The board comprises nine members, who are appointed by the mayor.

This policy specifically targets ELI households, and HPTF is required to dedicate 40% of its annual expenditures to develop or preserve affordable units for ELI households (DHCD, 2011). Further, at least half of all funds must be used to develop or rehabilitate affordable rental housing. Again, the funds allocated through this program are only a portion of what is needed to complete an affordable housing development. As such, CDCs may lack the capacity to adequately implement the program.

Purpose of the Study

Conflict often exists between the goals and priorities of policymakers and those of the street-level bureaucrats who implement the policies (Lipsky, 1980). Although there has been considerable research on CDCs and affordable housing (Bratt, 2006; Pickman, Roberts, Leiterman, & Mittle, 1986; Schill, 1996; Stoecker, 1996; Vidal, 1995; Walker, 2002; Wylde, 1999), none have studied the role that organizational values, beliefs, and feelings about a program play during the implementation of affordable rental housing policies. This study of affordable rental housing programs should shed light onto the problems that are often encountered by street-level bureaucrats during the implementation process.

The purpose of this study is to uncover the effects that street-level bureaucrats have on the implementation of affordable rental housing policies for ELI households within the CDC environment. The research focuses specifically on Ward 8 in the District.

Research Questions

With a focus on three CDCs in the District, this research is guided by the primary research question: How do street-level bureaucrats, within a CDC, affect the implementation of affordable rental housing policies for ELI households?

The primary research question can be further divided into four specific questions:

1. What are the concerns of the three CDCs in regard to their capacity to meet the housing needs of ELI households?
2. How do the staffs from the three CDCs interpret the frameworks of the LIHTC, HPTF, and HOME policies in regard to affordable rental housing for ELI households?
3. What are the common (consensus or conflicting) values that shape the behaviors of street-level bureaucrats within the CDCs?
4. To what extent are street-level bureaucrats' decision-making and authority limited within the CDC?

Rationale

As will be discussed in the literature review in Chapter 2, the primary implications of this study are regarding the policy applications for affordable housing programs. The practical significance of the research is to demonstrate the self-identified failings of CDCs and the causes for those failings. From a scholarly perspective, the research is significant in that it offers a broader understanding of poverty-induced problems in the United States, especially within the Washington, D.C. area and Ward 8 in particular. The effectiveness of non-governmental bodies in implementation of federal programs designed to alleviate poverty-related problems is of particular national importance given the trend at both the national and state level to cut funding for social programs.

The researcher anticipates that studies like this one can help to identify ways to correct issues in the administration of federal programs, perhaps demonstrating that "throwing money at the problem" does not address all of the reasons for the policy's failure to meet the needs of the targeted demographic group. Furthermore, the researcher anticipates that this well help other scholars develop a greater understanding of why housing continues to be an issue despite the millions of dollars spent on it annually. The researcher further believes that this research can help streamline future studies and identify areas of critical need for policy revisions, both within the CDCs and within federally funded affordable housing programs.

This research concerned itself with how and why CDC executive staff makes decisions in regard to which housing projects they develop within their communities. One of the goals of this study is to understand the critical gaps of affordable housing programs and how they work at the street level. Lipsky's (1980) street-level bureaucracy theory is useful when a policy implementation study focuses on the "informal, lower-level routines" of front-line workers and how they affect policy.

Lipsky argues that street-level bureaucrats have some discretion in how they implement formal policies that are often complex and ambiguous. During the planning and implementation phases, CDC executive staff often plays a major role in determining the housing mix of a proposed development. Because federal housing policies do not specify a specific mix of housing, it is the street-level bureaucrat who determines how much housing will be available for ELI renters.

Being that this research focuses on understanding the gap between the ascribed intent of affordable housing programs versus what actually happens when the programs are implemented, street-level bureaucracy theory is the best approach. Street-level bureaucracy theory focuses on

understanding what is produced by the policy/program, how it is produced, and why (Lipsky, 1980). These are critical concerns of this research.

Organization of the Remainder of the Dissertation

This chapter presented an introduction to and overview of the dissertation. Chapter 2 presents the relevant literature. The chapter includes definitions of the key terms that are used throughout the dissertation as well as literature on the role that CDCs and public-private partnerships play in the provision of affordable rental housing for ELI households. Within this context, the literature on street-level bureaucracy, public-private partnerships, devolution of housing policy, and goal congruence will be presented.

Chapter 3 contains the research design and methodology, and Chapter 4 includes the historical and local context. Chapter 5 contains the findings of the study. Chapter 6 presents a discussion of the main findings and the conclusions in regard to the challenges that CDCs face in the implementation of affordable rental housing policies. The chapter concludes with recommendations for future research as well as a look at what policy changes can positively affect the availability of affordable housing.

CHAPTER II: REVIEW OF LITERATURE

Introduction

This chapter begins by presenting Lipsky's (1980) theory of street-level bureaucrats and their use of discretion in policy implementation, which provides the main theoretical framework for the study. It then surveys the literature to suggest why CDCs represent optimal sites for studying the vicissitudes of U.S. housing policy, as well as for observing the use of discretion in SLB implementation of policy. Finally, it considers various perspectives on the use of public-private partnerships in the development of affordable housing and the devolution of federal policy to state and local authorities; and it offers theoretical and empirical grounding for the claim that, in light of devolution and increased reliance on public-private partnerships, goal congruence becomes critical to effective policy implementation.

Street-level Bureaucrats (SLBs)

Lipsky's (1980) theory of street-level bureaucracy presents implementers as reactionary in the public policymaking process. As front-line workers, street-level bureaucrats are caught between their responsibilities of being responsive to their clients' needs and implementing public policies as ascribed by formal policymakers (Lipsky, 1980). Similar to Lipsky's street-level bureaucrats, CDC staff appears to have immense discretion in the implementation of affordable rental housing policy.

Lipsky (1980) noted that street-level bureaucrats do not see themselves as policymakers. Nevertheless, street-level bureaucrats are indirectly engaged in altering, or creating, policy, if only as a means of coping with the problems that they encounter through daily interaction with their clients. In order to see this more clearly, it is useful to backtrack to Lipsky (1980) to

understand the importance of his contribution to the understanding of bureaucrats and bureaucracy.

Lipsky (1980) is best understood, theoretically, in relation to the foundational work of Weber, who theorized bureaucracies as a fundamental element of modernity (see Coser 1977). For Weber, the sine qua non of the bureaucracy was its rationality and impartial/abstract resolution of matters and carrying out of policy (Coser, 1977). CDC staff, like other street-level bureaucrats, play a pivotal role in delivering affordable rental housing to ELI households and in influencing the direction of policy.

Lipsky (1980) posits that implementers possess power to influence the outcome of policies. According to Lipsky, implementers have this authority through their ability to interpret policies in ways that will either bolster or hinder the service that is being delivered. Much of this policymaking ability is inherent in the nature of the work performed by street-level bureaucrats (Lipsky, 1980). The complicated nature of providing affordable rental housing to ELI households may create the opportunity for CDC staff to interpret housing policy to meet the specific demands of their clients. CDC staff seem to bear substantial similarities to Lipsky's (1980) street-level bureaucrats.

Characteristics of SLBs

The challenges that most CDC staff face are similar to those faced by many public service workers. Lipsky (1980) argued that public service workers are constantly faced with responding to the real-world challenges of their clients with inadequate and under-funded government programs. He noted that street-level bureaucrats are characterized by five elements: (a) having inadequate resources; (b) often having non-voluntary clients; (c) holding vague,

ambitious, or conflicting goals; (d) experiencing difficulty in measuring performance in regard to goal achievement; and (e) being overloaded with casework.

One characterization is having inadequate resources. This includes funding and personnel as well as resources which directly affect the ability to meet the clients' needs, such as, in this case, available low cost housing. A second issue is non-voluntary clients. These are clients that are not using the service by choice and therefore are generally unwilling to assist in their own development. They may be unwilling to share necessary data, unable or unwilling to spend time searching for adequate housing or otherwise uncooperative. A third problem, sometimes considered volunteer conflict, occurs when the street level bureaucrat has vague, ambitious or conflicting goals. These problems arise when the CDC employee wants to help people or has a vision that they will be changing lives and then encounters the reality of the work. Additionally, this can be the result when the employee begins to feel that the client is taking no responsibility for his or her own life improvement. Volunteer conflict can arise when the client seems less deserving of assistance or when the resources and restrictions of the program make it impossible to help someone who seems deserving of assistance but who does not meet the necessary qualification.

A fourth identifier of street level bureaucrats is their difficulty in measuring performance in regard to goal achievement. That is, these bureaucrats may often measure success by the placement of single individuals in adequate housing rather than meeting the overall goals of the program or they see failure in their inability to solve everyone's housing needs. Finally, street level bureaucrats can often be identified by the fact that they are overloaded with casework. Often because the effort of the program is to funnel as much money as possible to the clients, staffing needs are neglected and staff is overwhelmed (Lipsky, 1980).

Alienation as a Byproduct of the SLB Work Environment

The first and second identifiers-- having inadequate resources and non-voluntary clients—point to a facet of the SLB work context that Lipsky (1980) identifies as fundamental and pervasive: lack of influence and control. Although serving (often) non-voluntary clients, and working with inadequate resources, street level bureaucrats are commonly placed under significant pressure to produce results. Meanwhile, top-down priority-setting and management interventions may hinder them from carrying out their work in the way that seems most efficient, given the realities they face on the ground (Lipsky, 1980). The result is alienation, as SLBs come to view themselves as cogs in a complex, mechanistic system, rather than workers who are able to exert autonomy and bring creativity to their tasks (Hill & Huppe, 2007; Lipsky, 1980).

Over the last several decades, a governmental movement toward something known as employee empowerment programs emerged in response to a growing recognition of how the lack of autonomy and influence can stifle creativity and innovation among governmental employees. To a great extent, agency employee empowerment programs have focused on street level bureaucrats, precisely due to the characteristics cited by Lipsky (1980). There is an almost automatic assumption that as employees are empowered to participate in agency decision-making and explicitly charged with creative implementation, they will become more satisfied with their work and hence become more efficient, innovative, productive, and ethical workers (Petter et al, 2002).

However, research does not uniformly support the assumption that agency employees feel empowered by empowerment programs. Argyris (1998), for instance, noted that empowerment programs for street level bureaucrats often engender a sense of professional risk, and that employees may feel empowerment is “great as long as they are not held personally accountable

[for conflicting results]" (p. 99). Empowerment programs may also be perceived as creating increased workloads, rather than helping SLBs cope with existing ones (Petter et al., 2002; Argyris, 1998). In their study of street level bureaucrats, Petter et al. (2002) found that different groups of workers had different reactions to the concept of empowerment. Some welcomed the idea of having more of a say in agency decision making and being freed to produce creative solutions, without having to follow detailed protocols that may be unclear. Others expressed a sense of comfort in protocols, because it clarified their work and protected them (Petter et al., 2002).

Somewhat ironically, the history of employee empowerment programs merely serves to underscore a central tenet of Lipsky's (1980) argument: SLBs interpret requirements and apply instructions creatively, in order to meet the needs of their clients or fashion what they consider to be more appropriate solutions, whether or not their innovation is encouraged and authorized. Where the employee empowerment movement predicts that innovation and creative problem solving spring from empowerment, in Lipsky's (1980) framework, unorthodox approaches and initiative spring from alienation and lack of options. A certain amount of creative interpretive work, indeed, is more or less mandated by the constraints of the street level bureaucrat's environment. For instance, the situations that CDC staffs encounter are often too complicated to be covered fully by legislation or agency instructions and protocols. As a result of ambiguity, Lipsky (1980) observed, most street-level bureaucrats will encounter situations where there is no alternative but to interpret policy independently and proceed accordingly. Ultimately, then, whether or not an agency actively encourages autonomy and creativity, bureaucrats may have a tremendous amount of discretion over the functioning of programs and the allocation of benefits.

The Use of Discretion by SLBs and its Effect on Policy

One key implication of the de facto discretion that street level bureaucrats often possess is that they may inadvertently influence or reshape policy through the course of implementation. In certain contexts, moreover, discretion may enable street-level bureaucrats deliberately to implement programs and allocate benefits in ways that subvert the agency's policy goals. The goals of policymakers often conflict with the goals of implementers (Cumings & DiPasquale, 1998). Ambiguities in the system open the opportunity for SLBs to resist goals with which they disagree.

Not surprisingly, the role of street level bureaucrats in deliberately or inadvertently elaborating, influencing, or subverting policy has become a key area of concern in the public administration literature. However, the actual degree of SLB impact on policy is difficult to ascertain. Although numerous studies have been conducted over the past 25 years, seeking to quantify and measure the extent to which policy is shaped through bureaucratic practice, there has been little agreement as to results (May & Winter, 2009).

Scholars have argued that the lack of agreement concerning the extent of SLB influence on policy may reflect lack of conformity in the instruments and measures used by various researchers (May & Winter, 2009; Meyers & Vorsanger, 2003). It seems equally possible, however, that researchers find it difficult to obtain consistent results because SLB influence shifts across agencies, as well as within agencies, according to the nature of the program being administered and the urgency of client needs. Moreover, as the findings of Petter et al. (2002) suggest, an individual SLB's attitudes toward the job may play a role in the extent to which he or she actively uses ambiguity in order to press an agenda. These possibilities underscore the

importance of conducting detailed research among SLBs, in order to understand how they perceive their clients, their roles, and their relationship to policy implementation.

CDCs as Prime Site for Studying Both Housing Policy and SLBs

CDCs represent a particularly fruitful site for studying both U.S. low-income housing policy as well as, more generally, the way that SLBs interact with policy through implementation. On the housing front, CDCs receive a great deal of both positive attention and critique. With the devolution of housing policy to state and local actors (discussed more thoroughly below), CDCs became a fulcrum for joint public-private development projects, within the context of the CDCs' larger mandate to promote economic revitalizations of distressed communities (Gittel & Wilder, 1999).

Although their role in housing development has gained renewed salience as the result of housing policy devolution, CDCs first emerged in the 1960s in connection with the Civil Rights movement. Gittel and Wilder (1999) identify several distinct cohorts of CDCs that have emerged since that time. In their original, 1960s incarnation, CDCs drew public funding through the War on Poverty Special Impacts Program and private funding from the Ford Foundation. They were small in number (less than 100 nationwide as of 1970), but they pioneered ambitious initiatives related to business development, housing development, and provision of human services in struggling communities (Gittel& Wilder, 1999, p. 343).

The second cohort of CDCs took a more direct approach in taking on political projects—e.g., challenging banks' redlining practices and fighting urban renewal programs that entailed displacement of low-income populations (Gittel & Wilder, 1999). Simultaneously, CDCs were beginning to adopt entrepreneurial approaches to public services provision, which would position them for the role they have come to play under devolution. The decade 1970-80 was fruitful in

terms of CDC expansion, witnessing a tenfold increase to approximately 1,000 (Gittel & Wilder, 1999).

Although CDCs are now viewed as a beneficiary of devolution policies, it is important to note that at the outset of the Reagan period they faced significant challenges, due to the sharp reduction in federal monies available for community development. As federal monies dried up, however, CDCs became more aggressive in pursuing private sector funding and began concentrating more heavily on partnerships with state and local governments (Gittel & Wilder, 1999). By the 1990s CDCs were able to expand their role in community revitalization, due to their proficiency at assembling funding from diverse sources and partnerships.

The Clinton Administration re-secured the CDCs role going forward through its development of the Enterprise Zone and Enterprise Community (EZ/EC) programs. These programs broke new ground in the use of tax breaks, public-private partnerships and market incentives to encourage economic development in struggling areas. CDCs functioned as key advisors during the development of EZ/EC policy, as well as conduits for federal funding as the programs took off (Gittel & Wilder, 1999). CDC activity became so robust and widespread in the 1990s, that in 1999 Gittel and Wilder could confidently observe that CDCs were generally considered to be *the* primary vehicle for community redevelopment.

Presently there are 4,600 CDCs nationwide, with a median of 18 years of operation and median staff size of 10 (Democracy Collaborative, n. d., Table 1). They produce an annual average of 86,000 units of affordable income housing, as well as 8.75 million square feet of commercial and industrial space (Democracy Collaborative, n. d., para. 1). A 2005 Urban Land Institute (ULI) study found that of five CDC communities surveyed, all five were considered by stakeholders to have played a beneficial role in the community. Mean property values had risen,

moreover, in all five communities over the course of CDC involvement (although when more rigorous econometric methods were used to plot actual rises in property value against expected rises, absent CDC involvement, CDCs appeared to have fostered higher property values in just two of the five communities under study) (Galster, et al., 2005, p. 3).

Despite certain demonstrable successes, CDCs are subject to a number of critiques. One significant source of criticism concerns the dual role CDCs have come to play. On the one hand (according to their original mandate) CDCs work to empower communities and help residents to assume greater control over their communities' fates; simultaneously, however, CDCs act as developers, as well as landlords and business owners, with all the mechanisms of control and economic profit those roles imply (Gittel & Wilder, 1999). Additionally, since CDCs depend to a significant extent on private corporate and foundation funding sources, control over their agendas may become centered outside of the communities they serve (Gittel & Wilder, 1999).

Although the CDCs collectively produce affordable housing at a robust pace, critics point out that the capacities of individual CDCs are extremely uneven, due to the fact that each CDC must develop most of its own funding and revenue streams, and that they have been less successful than hoped at providing affordable rental housing for ELI households (Gittel & Wilder, 1999; Stoecker, 1996; Walker, 1993).

Finally, problems arise for many low-income residents when, ironically, CDCs prove "too successful." One customary mark of CDC success is an increase in property values, since property values rise as business activity increases, crime decreases, and the range of community amenities expands. However, this also means that the most effective and "successful" CDCs will, essentially, price members of their own core constituency out of the local housing market. For instance, shortly after Philadelphia's New Kensington Community Development Corporation

undertook a series of community improvement projects, such as rehabilitating abandoned homes, greening vacant lots, and creating an Arts Corridor where artists maintain studio space, real estate agents began to notice a need for low-income rentals in adjoining communities as New Kensington residents were priced out (Adams et al., 2008). In New York City's Clinton Hill, after decades of working towards economic revitalization, local CDCs finally managed to kick-start investment and integrate the stalled neighborhood economy with the larger, vibrant Manhattan economic base. In doing so, however, they may have "unwittingly set the stage for gentrification" and the loss of longtime community residents who could no longer afford local rents (Freeman, 2006, p. 5).

Due to their role as a fulcrum for public-private cooperative ventures and their successful track record of housing creation, as well as the substantial critiques they face, CDCs represent a particularly compelling nonprofit for the study of Federal Housing Policy. Simultaneously, they may represent a particularly productive venue for exploring the influence that street level bureaucrats exert on policy through the interpretation of regulations and discretionary decision-making. This has to do with the specifics of how housing policy has unfolded over the last 25 years. Beginning in the Reagan era, as discussed more fully in the next section of this chapter, federal housing policy came to focus on the use of market mechanisms and private sector engagement to increase the availability of low income housing (Swanstrom & Koschinsky, 2000). The shift toward market actors introduced new layers of complexity, since implementation came to rely on "extensive informal coordination" among state, market and non-profit actors (Swanstrom & Koschinsky. 2000, p. 84), and CDC staff members now had to determine how regulations should be construed and applied across these various contexts.

Concomitant with the rise of private sector involvement, federal housing policy was shorn of a unifying or "sustaining" ideological framework (Swanstrom & Koschinsky, 2000, p. 83), which suggests the loss of a unifying framework for bureaucratic decision-making as well. Given the number of actors involved and the devolution of authority to state and local levels, CDC staff members are tasked with implementing sometimes ambiguous policies and regulations, across three distinct regulatory contexts, while balancing the needs and pressures of three sets of actors, within a policy framework that lacks clear messages and priorities—all of which provides particularly fertile ground for the study of discretion in SLB implementation.

Public-Private Partnerships, Devolution of Housing Policy and the Importance of Goal Congruence

The private and non-profit sectors have relied on governments for significant portions of their funds used to supply clients since the 1960s (Moulton & Anheier, 2000). Additionally, as noted above, President Ronald Reagan called for substantial cutbacks in federal spending on housing programs in the early 1980s (Wylde, 1999). This laid the groundwork for the government's dependence on hybrid organizations, like CDCs, in the provision of affordable housing. It was the beginning of the partnership approach in housing.

Public-private housing partnerships are considered to be the way of the future in regards to delivering affordable housing solutions to low-income citizens (Suchman, 1990). In her work for the Urban Land Institute, Suchman (1990) identified two general types of housing partnerships forming in cities around the country: project-based or program-based. Project-based partnerships typically refer to a partnership arrangement designed for the purpose of one highly customized project; on the other hand, program-based public-private housing partnerships are designed to increase and expand the production of affordable low-income housing over a long

period of time (Suchman, 1990). Programs like the LIHTC, HOME, and HPTP require a program-based public-private housing partnership to achieve the goals set forth in the policies.

In a study on housing and community development in New York City, Wylde (1999) argues that the complex economic structure of public-private partnership housing transactions involves multiple layers of financing (equity and debt), broad allocations of risks, thus rendering such partnerships quite complicated to manage. Given these built-in complexities, it becomes even more important that goal congruence exists between the public and private sectors.

The next segment begins with a brief discussion of the possible effects of devolving federal housing policies to state and local governments. With LIHTC, the federal government rests the responsibility of implementation with the states. The literature will now focus on a prominent challenge for implementers of the LIHTC program brought on by devolution: how to achieve goal congruence in housing public-private partnerships.

Devolution of Federal Housing Policy

Devolution refers to the trend of devolving the responsibilities of the federal government to regional, state, or local governments (Smith 2000). Devolution is intended to enhance efficiency and productivity. One crucial aspect of the devolution perspective is that the government may not be the dominant player (Bortel & Elsinga, 2007). The federal government will need the resources of other public, private, and non-profit players to achieve successful implementation of its goals under this system.

Dating back to Nixon's new federalism, devolution is not a new concept in American housing policy (Smith 2000). There has been a common theme during the previous administrations to shrink the size of the federal government. Smith (2000) points out that the assumption that decentralizing the responsibility of providing affordable housing is flawed. The

fear is that is absolves the state and local governments of the responsibility of providing affordable housing to its citizens. Additionally, Kettl (2000) argues that devolution has had two major effects on policies:

1. It strained the traditional roles of all the players by creating a great dependency by the government on for-profit and nonprofit organizations for delivering goods and services, and
2. It strained the capacity of the governments and their non-governmental partners to deliver high-quality public services.

The devolution of federal housing policy implementation has brought challenges such as dispersed authority, diffuse accountability, and a greater need to account for more complex governance systems in both the governmental and non-governmental entities (Graddy and Bostic, 2008). Moreover, the likelihood of issues arising between the governmental agency and the non-governmental agency is high. A major concern is the potential for the lack of goal congruence as more public and private entities work together to address the housing shortfalls. Congruence issues could include conflict, goal ambiguity, or goal complexity (Orlebeke, 2000).

LIHTC, HPTF, and HOME devolve authority from federal to state and local government control in the implementation process of these housing polices. Meyers, Riccucci, and Lurie (2001) in their examination of the relationship between the frontline staff and the policymakers of social welfare reform, argued that devolution of welfare programs helped to explain some of its implementation shortcomings. Meyers et al. (2001) contributed to the implementation literature by demonstrating the importance of goal alignment between street-level bureaucrats and policymakers. They concluded that frontline staffers have great impact on policy implementation because they have the ability to direct, or redirect, resources as they see fit

(Meyers et al., 2001). Consequently, having clear policy goals will help to alleviate potential conflict and ambiguity issues.

Policy devolution requires the utilization of resources from public, private, and nonprofit entities. Each entity has its own values, interests, and objectives (Bortel & Elsinga 2007). Therefore, understanding the effects of policy devolution on the LIHTC, HPTF, and HOME is essential. The following section will discuss the potential impact of goal congruence during the implementation of LIHTC, HPTF, and HOME.

The Relationship between Goal Congruence and Effective Policy Implementation

National housing policies typically contain vague language that leaves the implementers, both public and private, having to make important policy decisions (Leigh, 1998). This highlights the need for goal congruence amongst the partners as the implementation of national housing policy is dispersed among public, private, and nonprofit agencies. Having goal ambiguity increases the probability that the policy will face implementation challenges that may lead to perceived failure of the policy.

Goal congruence should be principal to the policy implementation process. Indeed, scholarship on interorganizational relationships generally recognizes goal congruence as one of two key components to productive, joint organizational efforts—the other being mutual resource dependence (Lundin, 2007, p. 653). Specifically, interorganizational studies have found that community organizations cooperate more effectively when they have a shared sense of objectives (Lundin, 2007, p. 655, citing Schmidt & Kochan, 1977). Interorganizational research from Europe has extended this finding to horizontal cooperation among local actors (Lundin, 2007, citing O'Toole, 1983). Goal congruence has even been shown to facilitate the development of personal relationships and sharing of ideas between members of organizations involved in

joint ventures, leading to a heightened sense of organizational allegiance by high-level employees (Lundin, 2007, citing Luo, 2001). Conversely, poor goal congruence has been demonstrated to diminish interorganizational trust, which is fundamental to any cooperative effort (Lundin, 2007).

An additional insight into the importance of goal congruence, in policy implementation, stems from research into the effect of personal attitudes and biases on performance of administrative tasks (Lundin, 2007; Orlebeke, 2000; Wilson, 2000). Common sense would seem to suggest that bureaucrats' personal attitudes—including political orientation, as well as biases and prejudices—is likely to affect their decision-making, which can in turn interject unfairness or bias into the policy implementation cycle. Yet this commonsensical view likely represents only part of the truth.

Wilson (2000) drew on decades of research to challenge the commonsensical view that individual attitudes and biases shape how agency workers implement policy. For instance, research into variations in treatment of welfare recipients at different Massachusetts welfare offices revealed that worker attitudes did little to explain whether clients were treated brusquely or with respect. Instead, the chief variable affecting disparities in treatment was managerial policy: where managers insisted on respectful treatment of clients, treatment was more considerate (Wilson, 2000, citing Pesso, 1978). A similar insight comes from the field of policing, where personal attitudes potentially could have deadly consequences. For instance, in a 1966 study involving black and white police officers in a racially mixed city, some of the white officers who participated in the study expressed manifestly bigoted attitudes towards black citizens (Wilson, 2000, citing Black & Reiss, 1970). Intriguingly, however, officers' race had no statistically significant influence on decisions concerning whether to arrest; white and black

officers arrested black suspects at about the same rate, across similar circumstances (Wilson, 2000, p. 53). Here the key to the consistency of treatment appears to have been a full specification of the conditions under which officers should make arrests (Wilson, 2000).

Wilson (2000) did not explicitly link the question of personal bias in implementation and goal congruence. However, the cited research suggests that well-coordinated and articulated objectives can work to block the entrance of unwarranted personal biases into policy implementation. Goal congruence, thus, may have a role to play in ensuring that personal biases do not lead to implementation disparities across organizational contexts, where multiple organizations are involved in a joint effort.

In sum, goal congruence is critical to ensuring both vertical and horizontal interorganizational cooperation; facilitating individual attachment to organizational missions; and facilitating interorganizational trust. It may also have a role to play in ensuring that personal biases do not lead to imbalances in implementation across organizational contexts. However, goal congruence may be threatened under specific conditions, many of which are present within the U.S. federal housing program sector. First, just as the presence of goal congruence is necessary for the establishment of interorganizational trust (Lundin, 2007), trust is a necessary predicate to the development of goal congruence. Specifically, Lundin's (2007) study of interaction effects amongst trust, goal congruency and resource interdependence found that trust is rendered ineffective without goal congruence; in the absence of shared objectives, even mutual trust between organizations does not lead to enhanced cooperation (Lundin. 2007). Given longstanding tensions between non-profit and business sectors, Lundin's (2007) observations concerning trust as a predicate to goal congruence raise concerns about the viability of goal congruence in complex, public-private housing partnerships.

Another potential roadblock to establishing goal congruence is the complexity of the contemporary public housing development sector. There is a persuasive body of research that suggests goal congruence becomes increasingly elusive with the increasing complexity of implementation contexts (Meyers, Riccucci, & Lurie, 2001). Moreover, according to work by Meyers, Riccucci, and Lurie (2001), who measured alignment of objectives among managers and front line staff across three separate welfare organizations, goal congruence may be impeded by either the complexity of the organizational system or by the complexity of policy goals. In the public housing development context, both policy goals and organizational systems are often complex. When both types of complexity exist in one context, Meyers, Riccucci, and Lurie (2001) predict that "substantial uncoupling of formal and operational goals" may result (p. 2001).

Goal Congruence in Administration and Implementation of Housing Policy

Initially, the federal government chose to implement affordable housing programs on its own by building and managing public housing projects. In the eyes of many, this process proved to be a vast failure. As a consequence, Graddy and Bostic (2008) argue that it is unlikely that public housing will re-emerge as a preferred policy instrument in the near future. Therefore, policies that provide incentives to non-governmental entities to produce affordable housing are emerging. In other words, the federal government is relying more heavily on public-private housing partnerships in the production of affordable housing for low-income citizens.

In order to have meaningful and successful substantive policy partnerships that create more affordable rental housing units as set forth in the LIHTC, HPTF, and HOME, achieving goal congruence must be a paramount concern. In the LIHTC, HPTF, and HOME programs, state governments form partnerships with private and nonprofit investors, or developers, to help

build more affordable rental housing units. In an effort to better understand how certain public policies are carried out at the local level, interorganizational relationships need to be taken into account (Lundin 2007). In other words, how do these agencies and organizations collaborate with one another for the development of affordable housing for the extremely low-income residents?

Jackson and Mischen (2008) argue that collaboration requires cooperation among many actors. In addition, Lundin (2007) argues for the importance of formal collaborative relationships and their potential to alleviate externalities associated with fragmented systems. These arguments demonstrate the importance of multi-agency collaboration and interorganizational cooperation in implementing complex, multi-faceted policies.

In his research on cooperation in the Swedish labor market, Lundin (2007) argues that development and implementation of policy typically involves the efforts of many actors, making cooperation imperative to its success. Collaboration between partners is an important aspect in the successful implementation of the LIHTC, HPTF, and HOME. Understanding interorganizational collaboration efforts therefore is a key to tackling the cross-sectional areas of social housing policy.

Based on the public-private partnership typologies of Savas (2000) and Hodge and Greve (2005), LIHTC, HPTF, and HOME would be considered infrastructure partnerships, which requires public-private cooperation to achieve its goals. These partnerships maintain a loose organizational relationship with strong financial ties. Consequently, the public and the private entities may not need to go as far as creating a new organization; they just have to agree on a number of mutual financial arrangements (Hodge & Greve, 2005).

Savas (2000) organizes these financial arrangements into three broad categories. They include BOT (build-own-transfer), BOOT (build-own-operate-transfer), and sale-leasebacks. In some affordable rental housing developments, the non-governmental housing developer would build, own, and operate the housing development upon completion. Because of the great benefit to the non-governmental entity, they should also absorb more of the risks associated with such projects. The primary benefit to private and public partners in these arrangements involves the use of government funds to subsidize the developers at each phase of the process. Risk sharing in public-private partnerships is supposed to be one of the main incentives for the public and private actors to engage in such arrangements (Hodge & Greve, 2005).

There can be tremendous risks involved with affordable housing developments because of the mixed finances and the social services component attached to some projects. Governmental entities should pay close attention to risk allocation when entering partnerships with either private or non-profit organizations. Understanding each other's respective goals and objectives is a good first step toward effective risk management (Corner, 2005). In addition, Corner (2005) argues that allocating risks appropriately and being guided by the proper contractual framework will help guide public-private partnership in effectively reaching its goals.

The main purpose of collaborative efforts is to create and maintain a shared vision between the partnering organizations. However, due to the complexity of the government's goal of providing affordable housing and social services to low-income groups, goal congruence is difficult to achieve. DeLeon and DeLeon (2002) held that complexity in policy implementation has been accepted as an inherent part of the process. This complexity creates an even greater need for goal congruence amongst the many actors involved in the implementation process.

Meyers et al. (2001) also argue that achieving goal clarity in complex interorganizational environments is difficult.

As suggested by Keyes (1990), private partners are often involved in housing for reasons other than to help people. They are involved, generally, because it is financially better than whatever the alternative investment would have been at the time (Keyes, 1990). This presents a tremendous potential goal congruence issue for public-private policy partnerships. Conflicting goals between public and private partners is definitely not a novel concept.

Schon & Tluchowski (2002), in a letter response to Millennial Housing Commission Report, noted the ambiguity of the final rules relating the LIHTC, HPTF, and HOME. Boyne, Meier, O'Toole, and Walker (2006) argue in their book on public service performance that the need for managerial clarity is a key issue in public management. The findings support the value of clear goals and objectives for public organizations.

As noted by Boyne et al. (2006), Chun and Rainey argue that clear goals can help improve the implementation of national decentralized policies. Given the nature of low-income housing, the number of actors involved, and the complexities of the financial structure of partnership arrangements; it is of utmost importance to enter these arrangements with clear unambiguous goals and objectives (Suchman, 1990).

Barriers to Goal Congruence in Housing Policy

Competing and conflicting goals can lead to tension between public and private partners (Cummings & DiPasquale, 1998). In accordance with the public-private partnership literature, having clear goals and creating a shared vision are necessary for CDCs to be successful in the provision of affordable rental housing units for ELI households with their partners. Additionally, research indicates that the lack of goal congruence and the presence of goal ambiguity are

primary reasons for the implementation failure of federal policies (Chun & Rainey, 2005; Matland, 1995; Meyers et al., 2001).

Cummings and DiPasquale (1998) argue that the policy goals of government entities often conflict with the goals of private developers and investors. While CDCs and the federal government may be concerned with providing affordable rental housing units to ELI households, private-sector partners are likely more interested in building units that would provide the highest return on their investments.

Levy, Comey, and Padilla (2006) contend that, due to goal incongruence, legislative ambiguity, and goal ambiguity, LIHTC, HOME, and HPTF are not serving the lowest-income populations. Levy et al. found that policy administrators often set goals that are not shared by each partner. Examples include the federal government's targeting housing for high-risk population groups (e.g., ELI households) or requiring the availability of social services on-site at the housing development (Levy et al., 2006). Private investors and for-profit entities often do not share the same goals as those of policymakers. Thus, garnering private sector buy-in on such social issues is not easy for CDCs.

In an empirical study of the Swedish Public Employment Service offices and municipalities, Lundin (2007) found that cooperation is more likely between organizations that are resource interdependent, have congruent goals/objectives, and trust one another. Similarly, O'Toole (2000) stated that having a shared interest, without diverging objectives, also could be a powerful motivator within a public-private partnership.

Given the nature of ELI housing and the number of actors involved in the process, it is essential for CDCs to enter these arrangements with clear, unambiguous goals and objectives. Ambiguous language and complex goals in the LIHTC, HOME, and the HPTF programs make it

difficult for CDCs to successfully develop affordable units for ELI households (Cummings & DiPasquale, 1998). Boyne, Meier, O'Toole, and Walker (2006) argue for the importance of having clear goals and objectives for implementing agencies. Clarity of purpose decreases the probability that federal housing policy instruments will face implementation challenges that may lead to perceived or actual failure (Bortel & Elsinga, 2007; Matland, 1995). Thus, a focus on creating and communicating clear concise goals at all levels of the partnership is both highly recommended and desired.

CHAPTER III: RESEARCH DESIGN AND METHODOLOGY

Research Design & Methodology

Introduction

This research uses an exploratory multi-case method to study three CDCs in the District of Columbia as a means to understand how and why organizations make decisions in the context of developing affordable rental housing for ELI households. This section on research design includes the 1) restatement of the research questions, 2) the rationale for employing a multi-case study method, and 3) a discussion of the analytic framework of interpretive policy analysis, as set forth by Yanow (1996, 2000), and 4) a presentation of the data collection process.

Interpretive policy analysis seeks to understand the effect of street-level bureaucrats upon policy outcomes (Yanow, 1996). The street-level bureaucracy theory, where bureaucrats actively interpret policy, brings the clients more into focus through a bottom-up approach to implementation. Street-level bureaucrats have direct contact with the clientele who is being served by the organization, which can greatly affect implementation, as staff may have to be creative and use discretion in order to service the unique needs of their clients. As a result of this, street-level bureaucrats can be seen as making a contribution to the public policymaking process (Lipsky, 1980). CDCs operate similarly to street-level bureaucrats in that they also provide services and infrastructure directly to their constituency. Furthermore, street-level bureaucracies, like CDC staff, can influence the shape of policy through the use of their coping mechanisms and value judgments when servicing their clients (Lipsky, 1980).

Research Questions

How do street-level bureaucrats, within a CDC, affect the implementation of affordable rental housing policies for ELI households? The following three research questions were

designed to establish the extent to which the staffs of CDCs affect the implementation of affordable rental housing policies for ELI households.

1. What are the concerns of the three CDCs in regard to their abilities to meet the housing needs of ELI households?
2. How do the staffs from the three CDCs interpret the frameworks of the LIHTC, HPTF, and HOME policies in regard to affordable rental housing for ELI households?
3. What are the values (consensus or conflicting) that shape the behaviors of street-level bureaucrats within the CDCs?
4. To what extent are street-level bureaucrats' decision-making and authority limited within the CDC?

In order to address my first research question, I asked the following probes in order to uncover the primary concerns of CDC staff with regard to either internal or external threats. An example of this concern that many organizations face is a lack of resources. The following probes were asked of each participant.

- What would you describe as the major challenges you face in attempting to provide affordable rental housing to your clients?
- What factors enhance or impede the successful implementation of affordable rental housing programs?
- What other internal/external forces shape/have shaped the way you deliver housing to your clients?

My second research question sought to uncover the views that CDC staff holds in regard to the way affordable housing programs are structured. The goal here was to understand how the

staffs view the frameworks of the LIHTC, HPTF, and HOME. Yanow (1996) notes the importance of understanding which policy meanings are being communicated.

- To what extent are LIHTC, HPTF, and HOME being implemented by your organization?
- How do you characterize the workings of the LIHTC, HPTF, and HOME?
- What are the benefits and advantages of each program as a standard for the development/preservation of affordable rental housing for ELI households?
- What are the limitations, liabilities, and disadvantages of each program as a standard for the provision of affordable rental housing for ELI households?

The next research question addressed the values (common or consensus) that shape the behavior of street-level bureaucrats at each CDC. The following probes were asked.

- What motivates you to improve access to affordable rental housing for ELI households?
- Are there any particular characteristics that you associate with CDC staff that are interested in innovative affordable housing initiatives?
- How do you balance the needs of your clients with your organization's ability to provide such housing?

The final research question addressed concerns related to the bounds that limit street-level bureaucrats in their decision-making and authority at CDCs. Furthermore, it addressed the value conflicts that street-level bureaucrats may face in the implementation process. The following probes were asked.

- How do you feel your decisions are limited?

- Have you ever made a decision that was changed by someone of higher authority?
- Does a fear of discipline affect the decisions you make in your current role?

Analytic Framework

The interpretive policy analysis approach (Yanow, 1996) is used to better understand how street-level bureaucrats affect the implementation of affordable housing policies. An interpretive policy analysis approach has as its goal the determination of the meanings of a policy held by the multiple stakeholders involved in its implementation (Yanow, 1996, 2000). Interpretive policy analysts contend that context must be taken into account when deciding whether a policy is likely to achieve its desired outcome. This approach provides a lens for the researcher to discover how differing values, beliefs, and feelings about a policy can affect the ability of CDCs to provide rental housing to ELI households.

Yanow (2000) noted that interpretive policy analysis examines policy implementation with a three-pronged approach: (a) which policy meanings are being communicated, (b) who the intended audience is, and (c) the context-specific meanings that readers make of the policy artifacts. The artifacts relevant to this study include the policies, literature from the various agencies involved in the implementation of the policies, literature from the non-governmental stakeholders, and interview and survey data collected from all stakeholders. This approach presupposes that implementation issues often occur due to differing interpretations of the policy language. In determining the impact of public-private partnerships on the provision of affordable rental housing for ELI households, this research must first determine how each stakeholder frames the housing policy debate (Yanow, 2000).

Notably, interpretive methods are based on the belief that "[w]e live in a social world characterized by the possibilities of multiple interpretations" (Yanow, 2000, p. 5). With regard to social housing policy, it is "not possible for an analyst to stand outside of the policy issue being free of its values and meanings and of the analyst's own values, beliefs, and feelings" (Yanow, 2000, p. 6). This research seeks to produce a study that accurately uncovers the effects that street-level bureaucrats, within the three DC Ward 8 CDCs studied here, have on the implementation of affordable rental housing policies for ELI households.

The researcher recognizes the bias that may be brought into the data collecting and analyzing process. To account for this, data triangulation, where different sources of information are cross-referenced in order to increase the validity of a study, was employed (O'Donoghue & Punch, 2003, p.78). Moreover, all information from the primary data sources (i.e., interviews, historical data, and surveys) was cross-referenced to validate findings.

The interpretive approach involves the analysis of written and spoken language. In this study, the researcher used the four steps described by Yanow (2000): (a) identify the artifacts (language, objects, acts) and policy-relevant stakeholders (communities of meaning); (b) identify the specific meanings that are communicated through the artifacts; (c) identify discourse and the conceptual sources; and (d) negotiate, mediate, or intervene to bridge differences.

Yanow (2000) noted that the first two steps in interpretive policy analysis, to identify the artifacts and to identify the relevant policy communities, are interchangeable. The relevant policy communities involved in the implementation of the LIHTC, HPTF, and HOME programs are the DC DHCD, DC Housing Finance Agency, HUD, CDCs, private equity investors, and for-profit corporations. The identified artifacts should carry significant meaning for the relevant interpretive policy communities.

The third step of the interpretive policy analysis approach involves the identification of discourse between the policy communities. More specifically, the concern is how the implementers of the artifacts, related to the affordable housing policy instruments, talk and act with regard to the policies. The result of this step is valuable insight into the values, beliefs, and feelings of the policy-relevant community (Yanow, 2000).

After the identification of the various policy-relevant stakeholders, the next step is to determine the meanings that are not congruent among the groups. This step of the interpretive policy analysis is used to determine the "conceptual sources" of the conflict between or among the groups. The final step of the interpretive policy analysis is an intervention, which can take the form of negotiation or mediation, depending on the context of analysis, the particular policy, and the analyst's role (Yanow, 2000). In this instance, the researcher has chosen not to conduct a direct intervention as the problem is not to be solved here, merely illustrated and catalogued for the purpose of promoting further research and assisting CDCs in the identification of barriers to the successful completion of their missions.

Data Collection and Sources

This study focuses on the implementation of three housing policies by housing-focused CDCs in the District's Ward 8. The primary unit of analysis in this study is the individual CDC. As noted, the CDCs are WCCD, AEDC, and CHCTDC. These three CDCs were selected as the focus of this study because their stated missions are to increase the number of affordable units for the low-income residents in the communities they serve. In addition, the communities serviced by these organizations have exhibited the greatest need for housing intervention as compared to all other DC Wards. In the case of the implementation of affordable rental housing policies for the three Ward 8 CDCs that are the focus of this study, the street-level bureaucrats

are the Executive Directors. They are in large part responsible for carrying out the policy objectives as developed by government agencies like HUD.

Qualitative research requires the researcher to gain knowledge through a variety of tools and instruments (Yin, 2003). Further, Yanow (2000) stated, "Interviews, observation, and document analysis constitute the central interpretive methods for accessing local knowledge and identifying communities of meaning and their symbolic artifacts" (p. 31). Therefore, the data for this research was collected through three primary sources: detailed historical document analysis, interviews, and a follow-up survey.

Historical Data

Phase 1 of data collection involved obtaining historical data on housing units developed by participant CDCs in the district over the last 10 years. These documents include mission statements, newspaper articles, meeting minutes, strategic plans, reports, budgets, and other archival records. This step in the data collection process involved a detailed document analysis.

Semi-structured Interviews

Phase 2 of data collection involved semi-structured interviews (See questions in Appendix C). According to Yanow (2000), the goal of interpretive policy analysis is to capture the meanings used by policy-relevant stakeholders in their work setting. Specifically, the language of the various stakeholder groups is important to an understanding of their actions. Semi-structured interviews are an important source of such information in case study research (Yin, 2003).

Follow-up Survey

Phase 3 of data collection involved the use of a Follow-Up Survey (See Appendix A for IRB approval and Appendix D for Follow-Up Survey) to validate the data collected in the

interview and data collection phases. The instrument was constructed as a series of statements concerning issues central to the interview results (e.g., Q1: "There is serious concern about the lack of available rental housing for extremely low-income households in the community in which organization resides"). Respondents were asked to rank their level of agreement or disagreement with each statement on a 5 point, Likert-type scale: strongly disagree, disagree, neutral, agree, and strongly agree.

Data Analysis

Yanow (2000) presented metaphor analysis, narrative analysis, and category analysis as three methods of analyzing language, with the objective of discovering policy meanings. The primary method used in this study is category analysis. Category analysis "helps to identify the architecture of the argument that underlies a policy issue" (Yanow, 2000, p. 56).

Category analysis concerns itself with both the common usage and formal categories of a term (Yanow, 2000). Federal policymakers and community organizations use the common term of affordable housing. Yet, what is deemed affordable in policy language does not accurately reflect the same understanding of what is affordable according to CDCs and their constituencies. Thus, category analysis was a valuable analysis tool for this study.

To engage in category analysis, the researcher coded the data derived from the principal data sources, as discussed above and presented in Table 1. The data coding process is used to extract the words, phrases, themes, and categories that are pertinent to the research questions. The goal of coding is to rearrange the data into categories to be used for comparison and analysis. The data was utilized to identify themes from the policy relevant communities that are directly affected by the affordable rental housing programs.

The SLB Follow-Up Survey results will be used to present confirmatory and supplementary data and to provide a check on validity, as discussed further below. When relevant, any seeming variations between interview results, in terms of clustered themes that were emergent, will be noted and possible explanations for the variations will be provided. At times such differences may suggest avenues for future research, and these will be briefly explored as applicable.

Table 1: Research Questions and Data Sources

Research Question	Principal Data Sources
What are the concerns of the three CDCs in regard to their capacity to meet the housing needs of ELI households?	Interviews, CDC operational goals, meeting notes and other historical data, survey
How do the staffs from the three CDCs interpret the frameworks of the LIHTC, HPTF, and HOME policies in regard to affordable rental housing for ELI households?	Open-ended interviews, annual reports, newspaper articles, meeting notes
What are the common (consensus or conflicting) values that shape the behaviors of street-level bureaucrats within the CDCs?	Semi-structured interviews, meeting notes and other historical documents, survey
To what extent are street-level bureaucrats' decision-making and authority limited within the CDC?	Semi-structured interviews, meeting notes and other historical documents, survey

CHAPTER IV: Historical and Local Context

Introduction

As discussed in Chapter I, this dissertation addresses how street-level bureaucrats (SLBs) (Lipsky, 1980) of Washington, DC, Ward 8 Community Development Corporations (CDCs) affect the implementation of affordable rental housing policies for ELI households. SLBs are uniquely positioned as actors in the sense that they are mandated to carry out, on the one hand, national goals as articulated at the broadest and most general levels of policy; yet are charged, on the other hand, with responding to the most finely-grained and concrete circumstances among individual and family stakeholders (Yanow, 1996; Lipsky, 1980). Within their own spheres of discretion, SLBs thus come to perform important tasks of translation and interpretation, and their decisions may therefore serve to shape and channel federal policy, rather than simply implementing it in a straightforward way (Yanow, 1996; Lispky, 1980). This makes it all the more critical to understand the concerns and values that motivate SLBs in the affordable housing sector (RQ 1 and RQ 3); the ways they go about interpreting major policy instruments (RQ 2); and the constraints on their decision-making abilities (RQ 4).

The present chapter contributes to the research goals by synthesizing data from multiple source types, in order to create an integrated picture of the local historical context in which CDCs and SLBs have operated over the past decade. Historical context is operationalized in the present chapter to include: 1) local trends for affordable housing and its conceptualization (including its purpose and ideal form, e.g., ownership vs. rental housing); 2) local institutional trends, including the shifting influence of specific institutional actors, as well as policies and operative assumptions; and 3) local opinion among various stakeholder groups, as well as notable points of local controversy and conflict.

Unlike the review of key affordable housing legislation and programs presented in Chapters I and II, this chapter focuses on the local scene. However, local trends in affordable housing invariably are linked, in various ways, to broader, national ones. Therefore, the analysis attempts to identify such linkages, both as they manifest in objectively reportable, data-based trends, such as pricing and rental stock, and as they are constructed through local discourses. Similarly, as compared to the review of legislation and programs in Chapters I and II, the time frame described here is relatively short: 2004 to present. The shorter time period promotes a more finely grained picture of the shifting landscape in which SLBs have operated leading up to the period captured by interview and survey work at three Ward 8 CDCs. It is also, to a certain extent, conditioned by the availability of key source material (as discussed further below). Once again, however, the analysis attends to linkages with earlier trends as well as predicted, future ones.

As hinted above, and as discussed more fully below, the analytic strategy pursued here includes, in part, attention to local discourses of affordable housing across the sources groups analyzed. This is by no means to displace the importance of "hard" material factors, such as demographics or budget—a hazard identified by Ball and Hodgson (2001). However, particularly with reference to policy implementation and bureaucratic decision-making, discourses themselves represent very real, if not *material*, forces (Brenneis, 1994).

The cumulative picture assembled here adds important depth to findings on the role played by SLBs in the District's CDCs in two ways. First it helps to contextualize the concerns, values, and interpretive strategies of SLBs, as well as, ultimately their decisions, by offering a richer picture of the shifting material and discursive landscapes in which they have operated over time. Second and conversely, it allows their concerns, values, interpretive strategies, and decisions to

be evaluated in light of local trends, rather than simply in light of federal mandates and policies they are charged with implementing. In this sense, the present chapter may be considered "connective tissue" that allows us to link federal and agency-level realities.

The balance of the chapter proceeds as follows. First, a brief methodological discussion is offered, since this component of research was pursued parallel to the interview, data, and organizational research described in the larger thesis. This discussion details the sources types used; the analytic strategies applied; and how they were synthesized into a larger picture. The next section presents findings, interweaving chronologically, local trends in affordable housing and its conceptualization; relevant, local institutional trends; and local opinions and controversies.

METHODOLOGY

Sources, Sampling, and Interpretation

Sources

This section draws on two major types of source material. The first is agency and research reports for the period 2004 – 1014 that summarize trends in affordable housing, rental housing, and workforce-housing relationships. Reports that focus on the District and/or Ward 8 are given focused attention. However, Ward-8 specific reports are rare, and reports of trends in the District and in the nation as a whole for the period are also considered for purposes of comparison and context. Table 2 shows the primary reports drawn upon, along with the issuing agencies or organizations.

News reportage represents a second major source of information. As a major, nationally respected outlet, *The Washington Post* comprised one central source. *Washington City Paper*, which bills itself as an alternative publication with "[t]he largest weekly circulation of any

Table 2: Agency and Organizational Reports

Issuing Agency or Organization	**Report Title**	**Year**	**Comments**
D.C. Department of Housing and Community Development (DHDC)	*Consolidated Annual Performance Evaluation Report* (CAPER)	2013	Public agency.
		2012	
		2011	
	Housing Production and Affordable Housing Annual Report	2012	
		2011	
District of Columbia Office of Planning (OP)	INDICES: Chapter 6: General Services, & Housing and Community Development	2013	Public agency.
(*with Bay Area Economics*)	*Ward 8: Comprehensive Housing Analysis*	2008	
	Housing Characteristics	2008	
		2004	
District of Columbia Housing Finance Agency (HFA)	*American Recovery and Reinvestment Act 2009: Benefits to the District of Columbia's Housing Sector*	2009	Public agency.
National Low Income Housing Coalition (NLIHC)	*Out of Reach*	2013	Nonprofit research and advocacy that bills itself as "the only organization of its kind dedicated solely to socially just housing policy for extremely low income Americans" (NLIHC, 2014).
		2012	
		2011	
		2010	
		2009	
		2007-08	
		2006	
		2005	
D.C. Fiscal Policy Institute	*Disappearing Act*	2012	
Urban Institute	*Housing in the Nation's Capital*	2009	Nonprofit research group that bills itself as non-partisan. Reports subsidized by Fannie Mae.
		2007	
		2006	
		2005	
		2004	
Joint Center for Housing Studies of Harvard University	*America's Rental Housing*	2013	University-based research group; no affiliation described.
		2011	
		2008	

Center for Neighborhood Technology	*Beltway Burden: The Combined Cost of Housing and Transportation in the Greater Washington, DC, Metropolitan Area*	2009	
	Housing + Transportation Affordability in Washington, DC	2011	

publication in [the District]" (Jobs at Washington City Paper, n. d.) made a logical second choice, due to its active reporting on housing issues. *The Washington Informer* and *Afro-American* papers (amalgamation of D.C. and Baltimore publications) were tapped as providing differing voices from the African American community, although neither has full search capabilities for the time desired.

Sampling

In no case was a fully developed sampling frame required. In order to find relevant housing reports, something akin to a snowball sampling method was followed. In snowball sampling, the researcher builds a study sample by asking each informant for referrals to other potential study informants (Babbie, 2009). In this case, organizational links were followed on each site used, until the same organizational reports began to show up repeatedly (which is a typical end point for snowball sampling among human subjects) (Babbie, 2009). Relevant portions of all reports indicated in Table 2 were reviewed.

Newspaper sources were selected in two ways. First, a series of keyword searches on Google was used to identify publications with news reports on affordable housing in Washington, D.C. and/or Ward 8. Additionally, the researcher discussed the need for newspapers reflecting a range of views with members of the CDCs studied. This resulted in the four

publications tracked. In each case, sequential keyword searches were performed to attempt to ascertain the most inclusive returns. For the *Washington Post*, searches included, "Washington, D.C." and "affordable housing"; "Washington, D.C." and "low-income housing"; and Washington, D.C. and "Community Development Corporation." Returns suggested that affordable housing as a keyword was inclusive of "low-income housing" and "community development corporations" but returned the broadest results. Similar processes were followed for the remaining three papers; however, given their local profile, "Washington, D.C. was omitted from the search criteria.

Lists of available articles were then culled according to the emphasis placed on affordable housing. For instance, many articles referred only offhandedly to the matter, along with other social issues—these were discarded. The remaining lists were as described in Table 3. The numbers were not great enough to warrant sampling. Each article was briefly reviewed for an idea of the central theme. Those articles that presented as part of significant thematic clusters were then reviewed in more detail. However, a random check was used with each grouping to ensure that the review for themes was accurate and complete. Specifically, the number range (e.g., 1-67 for the *Post*) was entered into Random.org, and 20% of the articles (e.g., 13 articles in the case of the *Post*) were selected according to the random numbers generated, discarding doubles, and re-checked to ensure they had been adequately reviewed and classified by thematic content. The checks revealed that no central materials had been overlooked.

Table 3: Newspaper sources

Paper	**Years returned on final search**	**Final number after cleaning**
The Washington Post	2004-2014	67
Washington City Paper	2004-2014	83
Afro-American Newspapers	2010-2014	32
The Washington Inquirer	2008-2014	42

Analysis

The goal in this chapter was to assemble an overall historic picture, rather than provide an in-depth content analysis. Therefore, analysis proceeded along two lines. The first was an attempt to assemble a timeline of salient policy, funding, and other objective conditions for the creation of affordable housing in the District. This was challenging, given that the relevant agency and organizational reports have inconsistent runs through the time period in question, doubtlessly due to vicissitudes in research funding streams, as well as shifting priorities in local governance. Therefore, the broad goal was simply to create as comprehensive a timeline as possible, and to seek "gap data" where reports did not offer an adequate picture of funding type or etc. for a given year.

Reports and news stories were also analyzed for thematic content so that clusters of themes could be identified. Once identified, sources in the cluster were subjected to a basic discursive analysis. Discourse here is understood as a form of speaking and making claims that combines all the meaningful patterns of speech and uses of symbols, etc., needed to convincingly participate in a certain type of discussion (Gee, 2011, p. 18). As such, discourses are understood as being produced through institutions (including broad ones, such as professions), in accordance

with institutional goals and needs for distinctiveness, claims to expertise, and so on (Gee, 2011). Therefore, discourse transcends the motives of any one speaker and speaks to institutional currents (Gee, 2011).

A full-blown discourse analysis can require several, recursive stages of inquiry and analysis of speech acts at various levels of complexity (Gee, 2011). Here, however, once thematic clusters were defined, the goal was merely to delineate the contours of major discourses. Discourses were considered, in this respect, to include repetitive and naturalized normative claims. For instance, the importance of building sustainable affordable housing is a thematic cluster that appears through agency/organizational reports and news coverage. It also emerges as a discourse concerning the propriety, necessity and inevitability of producing green affordable housing.

The Vicissitudes of Growth: 2004-2007

The period 2004-2007 saw a region responding to the opportunities and pressures of what would be (with hindsight) referred to as the housing market bubble. Local trends in affordable housing tracked national ones—in particular the ongoing ascendance of mixed public-private ventures as federal dollars became ever scarcer. Between 2002 and 2003, the median price for a single-family home in Washington D.C. rose by more than 25%, putting substantial pressure on the District's extremely low income (ELI) populations (Turner, Kinglsey, Pettit, & Sawyer, 2004, p. 3). It jumped again by 17% from 2003-2004 (Turner, et at., 2005).

There are certain, potential salutary effects to rising home prices, even for low-income residents, due to increased housing industry related jobs as well as opportunities for longstanding homeowners to sell at unprecedented prices. However, the housing boom in D.C. was marked by pronounced unevenness, with a concentration of high-income jobs in the District and along the I-270 and Dulles corridors causing pricing pressures in those regions (Turner, Kinglsey, Pettit, &

Sawyer, 2004, p. 48). For low-income workers, there was far more of a work-housing mismatch, with job opportunities spread across the District and the suburbs, but housing opportunities concentrated disproportionately in the east and south (Turner, Kinglsey, Pettit, & Sawyer, 2004, pp. 49-53). Similarly, low-income residential patterns continued to be stratified heavily by race (Turner, Kinglsey, Pettit, & Sawyer, 2004, p. 49).

Employment in the District grew apace with housing prices, leading much of the nation with a 2.3 overall growth rate from 2004-2005, reflecting the addition of more than 65,000 jobs (Turner et al., 2006, p. 5). Yet as a net result, by 2005, the District of Columbia had the single least affordable rental market in the U.S., as computed by the National Low Income Housing Coalition (NLIHC) in their yearly *Out of Reach* report (Wardrip, Pelletiere, & Crowley, 2005, p. 11). (The NLIHC compresses housing indicators into a "housing wages" indicator, which reflects the monthly wage a 2-earner family must bring in, in order to rent a fair market value, 2-bedroom unit at 30% of monthly income. See Wardrip, Pelletiere, & Crowley, 2005). In 2005, D.C. topped the nation (including all 50 states and Puerto Rico, as well as D.C.) with a median housing wage of $23.56 (NLIHC, 2005, p. 18), putting tremendous strain on low-income residents. Not surprisingly, Turner, et al. (2005) found that

> As housing prices rise across the District, lower-income households and minorities represent a shrinking share of homebuyers, especially in neighborhoods that are experiencing the most intense market pressures. In 2000, 27 percent of the city's home buyers had incomes below $50,000; by 2003, that number had dropped to 15 percent (p. 8).

The share of minority buyers fell apace, dropping from 43% in 2000, to 37% in 2003 (Turner et al., 2005, p. 8).

After surveying a series of neighborhood groupings within the District—groupings that, unfortunately, do not align with the Ward system, making for difficulty in isolating Ward 8 effects—Turner, et al. (2005) made several recommendations for protecting low-income Washingtonians at a time of unprecedented growth and high prospects for the housing market: expand production of affordable housing stock, preserve existing affordable sale and rental units, increase funding and regulatory approaches to helping ELIs reach necessary payment levels, and develop a series of neighborhood-level strategies for affordable housing based on the unique market dynamics present in each neighborhood. In 2006, the *Housing in the Nation's Capital* report added a focus on education to the list (Turner, et al., 2006).

Faith in Mixed Financing Packages

Meanwhile, in this period, the discourse of affordable housing followed a national trend of highlighting complex public-nonprofit and public-private finance structures in unit creation. It is important that this be understood as much in terms of discursive trends as material ones, given that the District has proved somewhat sluggish as compared to the states in terms of channeling HOME dollars into partnerships with Community Housing Development Organizations (CHDOS) (O'Regan & Quigley, 2000). As described in Chapter I, due to federal devolution, leveraging of federal dollars through partnerships became a watchword in affordable housing development (Braithwaite, 2005). Indeed, the HOME program, which mandated 15% set-asides for CHDOs as of 2000 (O'Regan & Quigley, 2000) has become the largest single federal block grant available to the states, Puerto Rico, and D.C. (HUD Office of Community Planning and Development, 2013). Yet Housing and Urban Development (HUD) data for 1992-98 indicate that the District's HOME allocations to CHDOs hovered at 14.6% on average for the period, just

below the mandated level, as compared to regional highs of over 30%, and national highs of over 60% (O'Regan & Quigley, 2000, p. 309).

Nevertheless, tracking *Washington Post* coverage for 2004-2007 reveals a pronounced interest in the role of non-profits and other non-governmental partners in the creation of affordable housing. The only two *Washington Post* stories from calendar year 2004 to highlight the experiences of low-income renters/buyers both also highlight the role of local churches in partnering with government programs to create low-income housing for seniors (Abruzzese, 2004a; Arbuzzese, 2004b). The highlight the centrality of churches to the predominantly African American communities such as Ward 8 that define ELI need in the District. However, they also present public-nonprofit partnerships as "the way" to create affordable housing, although it represented just one part of a complex picture.

The next *Washington Post* article to deal in a full-fledged manner with the experience of low-income District renters/buyers did not appear until 2007, and it similarly featured complex development partnerships (Rivers, 2007), including one with Manna, a northeast District nonprofit mentioned in respondent interviews in connection with the difficulty of administering certain programs and qualifying residents (see Chapter IV, "Results for Research Question 2"). In this case, partnerships with both nonprofit and for-profit corporations were highlighted with regard to projects meant to bring affordable units to practicing artists—an undertaking with the potential double dividend of revitalizing commercial interests in an area as an artistic presence grows (Rivers, 2007). Intriguingly, neither this piece nor the two on church-sponsored projects in 2004 mentions other options for affordable housing in the District. By contrast, e.g., a piece from the Washington City Paper in 2007 notes the importance Mayor Fenty placed on preventing

landlords who accept federal housing vouchers from converting to higher-priced options, and retaining existing low income stock (DeBonis, 2007).

Another private sector strategy that merits attention here, and which less directly involves CDCs or federal funding, is the use of inclusionary zoning (IZ), which is zoning that mandates creation of a percentage of affordable units within new residential developments (DeBonis, 2007). Typically IZ would not create opportunities for ELI families; arguably, however, it could help relieve pressure from existing affordable stock overall, which would be of some benefit to ELI renters or would-be purchasers. (In at least one Massachusetts case, moreover, voucher programs were used in tandem with IZ to place ELI families in new, IZ-based housing units and simultaneously save voucher dollars for other users. See Cambridge Community Development Department, 2011). Although IZ has been used with some success in other areas, as of 2007, regulatory controls were still unclear; creating pushback in the developer community, particularly as housing prices began to spiral in the second half of the year (DeBonis, 2007).

Fallout from the Bubble's Burst: 2008-2010

In the period 2004-07, affordable housing was being squeezed by unprecedented growth in housing markets that resulted in uneven development, sprawl, and rising rental and purchase costs. Public interest in the provision of affordable housing centered on complex deals involving nonprofit (including church) and/or for-profit players, in line with the discourses established through over a decade of devolution policy and interest in leveraging public dollars. However, there was little to no sign of anticipation concerning how affordable markets would be impacted, should the housing bubble burst. The fallout from the housing finance meltdown that began seriously to impact D.C. mid-year 2007 (Bay Area Economics, 2008, p. 24) represents the key event for affordable housing over the next period relevant to CDCs.

Snapshot of Ward 8 in 2008

It is worth beginning this consideration with details from one of the few, comprehensive Ward-8 specific housing reports available, prepared by Bay Area Economics (2008) for the D.C. Office of Planning (O.P.). According to the snapshot offered at the outset of the report, from 200-2007, median annual incomes in Ward 8 struggled to top 50% of the District median (Bay Area Economics, 2008, p 4), despite overall employment gains in D.C. over the same period (Turner et al., 2006, p. 5). As of 2008 Ward 8 had both the highest concentration of affordable housing units in the District, *and* the highest concentration of households on the D.C. Housing Authority (DCHA) affordable housing waitlist—approximately 25% of all wait-listed households (Bay Area Economics, 2008, p. 5). Ward 8 also had a high concentration of ELI households reliant on both Federal voucher and local subsidies, but in danger of seeing their local subsidies expire within the coming decade, with no alternative secured (Bay Area Economics, 2008, p. 5).

Of the over 19,000 Ward 8 renter households in 2007, more than 30% were putting more than 30% of income towards rent; nearly a tenth of the Ward's owner households were putting more than 50% of income toward housing. Ward 8 already possessed the lowest percentage of homeowner households (23%, compared with the 40% D.C. average) (Bay Areas Economics, 2008, p. 5). Moreover, despite steady investments during the period of housing boom, Ward 8 entered the post-boom crisis with an unchanged image problem:

> Hot spots of crime, pockets of disinvestment, the concentration of poverty, the quality of schools, and the physical separation of this area from the rest of the District have all contributed to an unfavorable perception of Ward 8 over the years (Bay Area Economics, 2008, p. 25).

Not surprisingly, report authors found that the mounting foreclosure crisis represented a signal challenge to the area, as even small clusters of foreclose, abandoned buildings would serve to bring down already low property values and inhibit re-sale. “Particularly vulnerable are areas with emerging local real estate markets that sit on the threshold between disinvestment and positive changeover” (Bay Area Economics, 2008, p. 24). The Ward was further being undermined by the fact that over half of its co-op units represented investments rather than owner-occupied housing, creating more blank spots and glutting the market, though not with affordable choices. Meanwhile, rental units produced under LIHTC were jeopardized, since LIHTC rent structures are determined by median incomes, which were not rising apace with operating expenses and property taxes (Bay Area Economics, 2008, p. 26).

Not surprisingly, the picture drawn for Ward 8 was being played out for the District and its suburbs as a whole. In 2009, Pettit et al. reported that housing prices for the nation’s Capital had fallen over 30% in under two years, and foreclosures had increased 800% (p. 4). The potential spillover effects for surrounding properties were similar in all areas of the District and its suburbs (Pettit et al., 2009, p. 5) though perhaps felt most acutely by low-income communities in transition, as noted in discussion of Ward 8 above (Bay Area Economics, 2008, p. 24). Given that about 80% of the high-risk mortgage loans concluded from 2004-2006 went to minority homebuyers, minority residents in the Capital were disproportionately being affected by or at risk of foreclosure (Pettit et al., 2009, p. 4). Nationally, as well, riskier subprime loans were disproportionately offered to buyers in buyers in low-income, largely minority communities—47%, as compared to 15% for buyers in high-income, largely white neighborhoods (Joint Center for Housing Studies, 2008, p. 3).

New Discussions around Renting

Another effect of the housing bubble collapse was to stimulate national discussions around renting. It was clear to early observers, that both nationally and in the District, the foreclosure crisis would have important spillover effects for renters. Indeed, "[r]oughly half the households in the District of Columbia affected by foreclosure in April 2009 were renters—about 1,900 households" (Pettit et al., 2009, p. 5). Beyond these direct effects, rental pressures were poised to play out in a complicated push-pull pattern. On the one hand, foreclosures drove homeowners into the rental market, so that after experiencing a slow, fairly steady growth rate of less than 1% annually over the years 2003-06, the number of renter households rose nearly 3% in 2007 (Joint Center for Housing Studies, 2008, p. 2). Since many of these new renters were former homeowners with steady salaries (albeit insufficient income to avoid foreclosure), the toll fell hardest on low-income renters, who were already burdened with steady gains in rental prices relative to earnings (Joint Center for Housing Studies, 2008, p. 4). If the NLIHC's National Housing Wage was $16.31 in 2006 (Wardrip, Pelletiere, & Crowley. 2006, p. 4), it rose to 17.32 by 2008 (Wardrip, Pelletiere, & Crowley. 2008, p. 4); $17.84 by 2009 (Wardrip, Pelletiere, & Crowley. 2009, p. 4); and $18.44 by 2010 (DeCrappeo, Pelletiere, Crowley, & Teater, 2010, p. 6).

On the other hand, the supply-side picture was mixed. For instance, in a choked sales environment, owners and developers had incentive to rent rather than sell units, and some homeowners opted to rent their own properties and lease lower-cost housing at a lower rate, rather than face foreclosure (Joint Center for Housing Studies, 2008; Wardrip, Pelletiere, & Crowley, 2009). This increased rental stock and placed downward pressure on pricing. On the other hand, developments stalled due to funding unavailability, and banks often opted to take

foreclosed properties out of circulation, thereby narrowing the pool of potential rental stock overall (Joint Center for Housing Studies, 2008), thereby creating an inflationary pressure.

The ultimate picture appears to be that effects varied by location and market segment, but that low income renters proved to be net losers overall. In part this was because the financial crisis brought worsening unemployment rates, which disproportionately impacted communities of color, the disabled, and other populations already at risk of being ELI housing seekers (DeCrappeo, Pelletiere, Crowley, & Teater, 2010, p. 4). Meanwhile, the rental stock surplus being felt in certain regions accrued largely to higher-end units build constructed during or toward the end of the housing bubble (DeCrappeo, Pelletiere, Crowley, & Teater, 2010, p. 4)—an historical irony, given that LIHTC was one of the few forces stimulating rental unit development in years leading up to the housing market collapse (Joint Center for Housing Studies, 2008). By 2008, before the full effects of the crisis were felt, 71% of ELI households nationwide spent more than 50% of their income on rent, and just 37affordable, available units existed per 100 households in need (DeCrappeo, Pelletiere, Crowley, & Teater, 2010, p. 2). The credit drought only added complexity to the task of housing rehabilitation and new affordable housing starts. By late 2007, District developers claimed, e.g., that they could not meet evolving IZ standards, given the fiscal crisis (DeBonis, 2007).

On the whole, however, the housing market crisis raised new questions around the place of rental stock in national affordable housing approaches. While many of the recommendations being aired applied more forthrightly to Midwestern or non-dense urban environments, some were highly applicable to affordable housing in the District. Already in 2008, the Joint Center for Housing Studies at Harvard noted that assisted rental inventories were declining as Section 8

commitments expired and assisted living contracts reached their end (a hazard shared in high concentration by ELIs in Ward 8, as discussed above). The authors conclude:

> Since developing new affordable rental housing remains difficult without steep subsidy, preserving whatever low-cost units remain should be an urgent priority. The success of preservation efforts depends in large measure on the willingness of Congress to appropriate sufficient funds to renew expiring project-based contracts and fund additional efforts to slow the loss of privately owned low-cost rentals. Without new affordable housing initiatives and expanded funding to bring these initiatives to scale, the affordable rental inventory will continue to shrink (Joint Center for Housing Studies, 2008. P. 20).

On the ground in Washington, D.C., as the fiscal crisis became entrenched, affordable housing ranked third (behind transportation and economy) as the region's most pressing concern, according to one poll of District voters (Samuelson, 2009). Faith-based partnerships continued to generate some of the few new affordable projects (Riley, 2010), but IZ projects were receiving heavy criticism for, among other things, imposing stiff re-sale penalties on low income purchasers who chose to move within the first several years of residency. And 2010 was marked by a tent city protest to Mayor Fenty's lack of success in creating new affordable housing (Rowley, 2010).

ARRA Funding Priorities

In a concrete, material sense, however, perhaps the most important aspect of the period was the influx of dollars to affordable housing via the American Recovery and Reinvestment Act (ARRA) of 2009. The Act promised to channel tremendous dollars into foreclosure and homelessness prevention and affordable housing initiatives, both nationally and within the

District. The D.C. Housing Finance Agency (DCHFA) predicted that influxes would be tantamount to the figures from Table 4.

Table 4: ARRA Housing Related Appropriations

Program	**Total Federal Dollars**	**District's Share**
Public Housing Capital Fund	$ 2,985,000,000	$ 27,019,862
Tax Credit Assistance Program	2,250,000,000	11,644,346
Homeless Prevention Fund	1,492,500,000	7,489,476
Community Development Block Grant Fund	980,000,000	4,896,122
Lead Hazard Reduction Grants	99,500,000	2,616,843
Project Based Rental Assistance	2,000,000,000	40,916,923
Totals	**$ 9,807,000,000**	**$ 94,583,572**

Source: DCHFA, 2009, p. 4.

Despite the impressive dollar amounts, however, two things stand out about the ARRA housing-related appropriations. First is that—in line with the Act's emphasis on economic stimulus—funding lines came in most cases with short deadlines and the prospect of forfeiture should deadlines not be met. So, for instance, a complex new addition to projects with LIHTCs awarded in 2007, 08, or 09 depended on a swift issuance of local agency rules, and commitment of 75% of funds within one year; expenditure of 75% of funds within two years; and expenditure of 100% of funds within three (DCHFA, 2009, p. 6).

Second, while monies were included that could be used to provide stopgap (one- or two-year) extensions of rental housing subsidies to low-income households (DCHFA, 2009), there

was no sense in which the ARRA funding contemplated even a medium-term solution to expiration of Section 8 and other subsidized housing contracts. Meanwhile, as noted above, a great many Ward 8 ELI rental households are at risk of losing subsidies that enable renting; 55% percent of locally subsidized (or 3,725 units) are set to expire by 2018; approximately 40% of these also receive Section 8 voucher assistance (Bay Area Economics, 2008, p. 5). Meanwhile, ARRA's $2 billion in nationwide funding for "neighborhood stabilization" could be used in part for demolition of worn down (likely, affordable) housing, as well as for purchase and redevelopment of or rehabilitation of foreclosed upon properties (DCHFA, 2009).

Conclusion: Conflicting Signals: 2011 to Present

The period 2004-2007 suggested a range of issues and challenges for CDCs during a period of rapid development that placed conflicting pressures on ELI populations, although it betokened the promise of neighborhood revitalization. With the crash of 2007 and its increasing effect on District housing markets, low-income communities suffered disproportionate impacts from foreclosures, rising unemployment rates and stalled creation of new affordable housing. ARRA promised funding to help ease depleted affordable housing reserves, yet it mandated swift timelines for projects already considered difficult to implement and embodied certain incentives that either contradicted or merely delayed long-term policy fixes.

As a net result, both material and discursive pressures on decision-making that will affect ELI housing in the District and Ward 8 are conflicting and unclear. A look at the multi-year controversy surrounding redevelopment of the "Big K" site in Anacostia provides a glimpse of how these complex pressures, as well as longer-standing community concerns, can play out in the development of a mixed-use project with potential to revitalize a corner of Ward 8. On the one hand, Marion Barry has staunchly supported the project (Weiner, 2013). This despite his

own recent proposal to ban any new production of rental housing in the Ward, in line with his own commitments to ownership, but at odds with a broader national conversation concerning the centrality of rental housing to a balanced, affordable, national housing stock (Butler, 2011). On the other hand, neighborhood resistance is sharp, based in no small part to objections concerning the proposed project's fit with the community feel (Weiner, 2013; Muller, 2014). However, objections include, as well, a feeling that Ward 8 is already awash in affordable units, and that more diversified approaches are needed, so that low-income renters can be spread throughout the District rather than concentrated in impoverished pockets (Weiner, 2013; Muller, 2014). Yet the "affordable" units of Anacostia are still nowhere near what an ELI household would require (Weiner, 2013).

In the wake of policies of devolution, and the ascendance of LIHTC and HOME-type programs to spur complex finance packages that leverage federal dollars and involve nonprofit and private partners in development, CDCs must now face similar conflicting pressures at the local level in order to shepherd projects of potential use to low-income owners and renters. It creates a situation in which the discretion wielded by SLBs can become particularly important, far beyond the mere interpretation of written policy. Hence it becomes all the more important to understand the concerns and values that drive them in their work, and the rubrics they apply in interpreting their mandates and their roles, their values, and in determining whether to extend or withhold the discretion that may be built into their roles.

CHAPTER V: RESULTS

Results

Data Analysis

The objective of this study was to identify factors relevant to four research questions as reflected in the data from three face-to-face semi-structured interviews as well as a review of historical data, annual reports, media articles and academic literature related to the issue of affordable housing and CDCs. In the following chapter, the researcher will discuss the methodology for the data analysis, including tools used for that analysis, and a discussion of the reliability and validity of this methodology. This chapter includes tables summarizing the definition of the identified themes and subthemes, the frequency of occurrence for the themes and subthemes, as well as the number of interviewees that mentioned a specific theme and subtheme. Exemplar quotes are also provided. The chapter concludes with a summary of the findings and a short discussion of bias, which may exist in the study. Each interview was considered individually in the analysis. Common themes were identified across the data with regard to addressing the research questions.

Data analysis procedures

The process of data analysis involves "making sense out of text and data…and preparing the data for analysis, conducting different analyses, moving deeper and deeper into understanding the data, representing the data, and making an interpretation of the larger meaning of the data" (Creswell, 2009, p. 183). The researcher searched for patterns, themes, and dimensions in the data through analysis of the interviews, coding of the data, and further analysis as themes and patterns emerged. The researcher's goal was to describe the participants' subjective experiences and views.

The first level of identification occurred during the initial review of each interview transcript. Upon receiving the transcripts, the researcher read each transcript, analyzed the data for each interview, and then conducted open coding utilizing NVivo software, which is an analytic tool to facilitate the coding process.

The researcher used *open coding*, which utilizes a brainstorming technique described by Corbin and Strauss (2008) to "open up the data to all potentials and possibilities contained within them" (p. 160). In open coding, the researcher thoroughly reviews the data contained within the data set before beginning to group and label concepts. The process of coding is taking the raw data and pulling out concepts and then further developing them in terms of their properties and dimensions, and grouping them into themes. The data analysis process included the following steps:

1. Review all interview transcripts
2. Import the data into NVIVO
3. Code the data in NIVIVO using open coding
4. Define the properties of the dominant themes
5. Create subthemes, if needed.

The resulting themes are described in the summary of the research findings.

Validity, Trustworthiness, and Reliability

The researcher ensured the validity, trustworthiness, and reliability of the research study through employing various mechanisms. Qualitative validity, according to Creswell (2009), means that the researcher checks for the accuracy of the findings by employing certain procedures (p. 190). Validation of findings in qualitative research occur throughout the steps in the process of the research (Creswell, 2009). The researcher did a continual check during the coding process to ensure that coding did not drift from the original intent as the coding process

evolved. As only one researcher was responsible for analyzing the data, there was no need to cross check for intercoder agreement. The findings from the Follow-Up Survey (Appendix D) provided an additional check on validity.

A qualitative method is appropriate for the study of phenomenon influenced by many variables where the relationship between the variables is difficult to measure (socialresearchmethods.net, n.d.). Qualitative research uses methods intended to produce descriptive data about the occurrences, circumstances or facts under investigation to provide an understanding of the way study participants perceive the occurrences, circumstances or facts, (Creswell, 2004). The qualitative research method fundamentally assumes an understanding of complex occurrences, circumstances, or facts that can be fully understood only by examining connections and relationships not apparent in objective data. The qualitative research method also assumes the existence of an interaction between the research and the occurrences, circumstances or facts. It can be viewed as a means of hypothesis generating rather than simply hypothesis testing.

Researchers rarely survey the entire population for two reasons: the cost is too high and the population is dynamic (Bosmans, et al., 2008). Due to time constraints, finances, and other related logistics that may hinder the entire population size, this research was confined to a directed sample, which may not allow generalization to a larger population. The main advantage of using a directed sample in this research is the study design and availability of participants. The study therefore assumes that the reliability and validity of data sets in the population will increase while the level of sample error and bias will reduce drastically due to the small size of the entire sample population (Bush and Burns, 2006). That is, because this is a culturally

homogenous sample, as well as a sample of limited size, the validity and reliability of the research is not as significant as it would be if a larger group were studied.

However, the benefit of a multi-case study is that it allows for more precise data collection. At the same time, the impact of researcher or subject bias is reduced. Bondas and Hall (2007) argue, "in order to be valid, results should at least be reliable (i.e., reproducible under identical testing conditions) and consistent between labs (i.e. at least similar-testing conditions may be somewhat different but outcomes theoretically should converge)" (p. 220). Thus research is considered unreliable when the testing conditions cannot ever be precisely duplicated.

Graziano and Raulin (2010) also note that although each research instrument needs to be reliable, qualitative researchers need to be able to count on data that also makes sense from an external perspective and is consistent. In order to ensure that this occurs, a complete explanation of how data collection and analysis occurred during the research process has been included. Authors on qualitative research (Bondas & Hall 2007; Graziano & Raulin 2010; Sandelowski & Barroso 2007; Saunders, Lewis, & Thornhill 2009; Trochim & Donnelly 2007) point to many ways of validating this type of research using both archival and qualitative assessment. Willis (2005) notes in particular that the concept of validity refers to "whether measures produce results consistent with our conceptual intent" (p.22). Willis (2005) demonstrates that in qualitative frameworks of study, that validity is not a measure of whether the research framework is repeatable, but whether it measures what we want it to measure. In this research, to ensure internal validity both peer review will be used, and participants of the study will be asked to validate the data and interpretations, as recommended in the literature (Bondas & Hall 2007; Graziano & Raulin 2010; Sandelowski & Barroso 2007; Saunders, Lewis, & Thornhill 2009;

Trochim & Donnelly 2007). Therefore, the validity of the research is secure, while the reliability may be less so.

Additionally, there is some chance of researcher bias within the framework of this study. Though it is specifically talking about scientific research, an opinion from Stanford University makes it clear that the changing way we look at research, including bias in subject selection is effecting the way we determine the validity of the research. " [B]ias will increasingly be recognized as the most important 'threat to validity' that must be addressed in the design, conduct and interpretation of such research," (Ranshoff, 2005). Though Creswell (2004) and others have long pointed out the dangers of researcher bias creeping in to qualitative researcher, it seems important to note that other forms of bias can mar the effectiveness of a study. In this case, because the researcher is the sole set of eyes coding the interviews, and the researcher conducted the interviews, researcher bias may have crept into the data. The follow-up survey with the interview participants helps to negate any bias that occurred.

Coding

The coding process identified a total of 18 primary themes. The themes were delineated into four areas, with each area focusing on one of the research questions. The findings for each research question are summarized and exemplars from the interviews are used to illustrate the themes and subthemes.

Tabulation

Results of the SLB Respondent Follow-Up Survey were tabulated and are presented as follows in Table 5.

Table 5: Levels of agreement or disagreement with items Q1 through Q14 of the Follow-Up Survey

Statement	Total number of respondents who note level of agreement or disagreement				
	Strongly Agree	Agree	Neutral	Disagree	Strongly disagree
Q1. There is serious concern about the lack of available rental housing for extremely low-income households in the community in which my organization resides.	2	1			
Q2. There are concerns about the rising cost of affordable rental housing for my constituents.	3				
Q3. There is a lack of support for affordable rental housing program from citizens and policymakers.		2		1	
Q4. There should be more sharing of valuable knowledge among community organizations involved in the preservation and production of affordable rental housing.	2	1			
Q5. There are concerns about organization goals not being aligned with those of the community.		2		1	
Q6. The Low-Income Tax Credits, HOME program, and the Housing Production Trust Fund are difficult for my organization to use to provide affordable rental housing for my constituents.	1		1	1	
Q7. The Low Income Housing Tax Credit, HOME, and the Housing Production Trust Fund programs are useful and beneficial to organizations who have the capacity to implement them.	1	2			
Q8. There is a perception fraudulent activities regularly occur in the implementation of affordable housing programs.		2		1	
Q9. There is a perception that the availability of program funding fluctuates and is inconsistent.		3			
Q10. A desire to help constituents locate affordable housing is a	2			1	

common value among street-level bureaucrats who work at CDCs.					
Q11. CDC employees must be driven by a desire to help the community they serve.	3				
Q12. Expressing concern for constituents is a necessary quality for an employee of a CDC.	3				
Q13. CDC employees work to ensure the community reflects economic diversity.	1	1	1		
Q14. My authority and decision making is limited by the availability of financing/funding for affordable rental housing.		2			1

Results for Research Question 1

Research Question 1: *What are the concerns of the three CDCs in regard to their capacity to meet the housing needs of ELI households*? The six primary themes related to this research question are summarized in this section. This section includes tables summarizing the definition of the identified themes, the frequency of occurrence for the themes and subthemes, as well as the number of interviewees that mentioned a specific theme and subtheme. As reflected in Table 6, the primary themes were *lack of housing*, *cost of housing*, *size of housing*, *lack of support for housing*, *communication and sharing*, and *matching goals*.

Table 6: Themes and Definitions for Research Question 1

Theme	Definition
Lack of housing	Lack of available housing for stakeholders; refers to a lack of rentals or ownership properties
Cost of housing	Concerns about the cost of affordable housing for constituents. Rental and home ownership opportunities are not affordable.

Size of housing	Housing size is inadequate
Lack of support for housing	Programs lack support from politicians, citizens, or policy makers. Lack of support refers to lack of financial support or political support.
Communicating and sharing	Concerns about lack of communication and sharing of valuable knowledge
Matching goals	Concern about organization goals being inconsistent with those of the community.

Table 7 shows the frequency with which the themes appeared across interviews and across the data.

Table 7: Frequency of Themes for Research Question 1

Themes and Subthemes	Number of interviewees mentioning this theme	Total exemplar quotes
Lack of support for housing	3	8
Communicating and sharing	2	7
Cost of housing	2	6
Lack of housing	3	5
Size of housing	1	1
Matching goals	1	1

Lack of Support for Housing

The most frequently occurring theme for Research Question 1 was lack of support for housing. This theme was defined as lack of resources to generate available housing for

stakeholders and lack of rental or ownership properties. Training, or tenant education, was mentioned eight times in three interviews. Bessie mentioned the lack of support:

> I think it's a money issue. Developers can make more money. It's bothersome to provide rental housing. The management aspects are great, even with a good management company. There is a lot of tenant education that needs to happen, too. I think that developers [tones] just don't want to be bothered with the headache, long-term.

Ruth shared the experience of a colleague to illustrate the lack of support with housing:

> We have a board member here who got affordable housing. She was moved out of the...When the Hope Six project came in over there, her place was razed and she waited and waited and waited and moved out of the neighborhood and then was able to hold on to her voucher which they gave her the option of getting.
>
> She got into some of the brand new housing on the waterfront. Beautiful place, but again she had no furniture. She had nothing to move into. These mixed income developments – if there are no support services to help low-income families who are moving into this, it really accentuates the difference.

In another example, Patrice indicated a lack of support for housing by stating, "The financial institutions need to support affordable homeownership programs in low and moderate-income communities, versus rental programs."

The Follow-Up Survey revealed that two of the three respondents agreed with the statement "There is lack of support for affordable rental housing from citizens and policymakers" (Appendix D, Q1). One of the respondents disagreed. This contrasts with the fact that all three respondents mentioned lack of support for housing in interviews. The disparity may well be explained by the fact that item Q1 specifies the *sources* of support for housing (or lack thereof), including both citizens and policymakers. One survey respondent disagreed that citizens, policymakers or both are sources for such lack of support, even while identifying a lack of support as an extant phenomenon.

Communicating and Sharing

The next theme for Research Question 1 was *communicating and sharing*, which refers to concerns about lack of communication and sharing of valuable knowledge. It was mentioned seven times in two interviews. Ruth mentioned how communication and sharing was an issue for her CDC:

> A lot of it is its communication. It's getting the information to begin with, figuring out where the affordable units are right now in the neighborhood, because there is no easy way to really determine where all the affordable housing is. It's clear where the public housing is, but in all the other buildings around here, we've gone on to certain city websites that purport to map affordable units, but they're either not accurate or we're not using them correctly, because we're not finding evidence, because all of these buildings are pretty much managed by independent private management companies.
>
> Even though the city might have certain agreements with developers that they have affordable units in there, it's not like those management companies put that right on the front of their page.

Patrice indicated that CDCs do not communicate or share information:

> No, but that was the one that did development in Congress Heights. Then you have us. We're down here in Bellevue, where people outside of our community say they have three CDCs over there at Ward 8. How are they working together? Even though everybody has their own project, there's not really any cross-pollination with the three CDCs that were doing the development work.

Results of the Follow-Up Survey (Appendix D) strongly confirm the validity of results achieved through interview and coding. Two of the three respondents strongly agreed with the statement "There should be more sharing of valuable knowledge among community organizations involved in the preservation and production of affordable rental housing" (Appendix D, Q4). One respondent agreed with the statement. No respondents noted strong disagreement, disagreement or neutrality vis-a-vis the statement.

Cost of Housing

Another theme for Research Question 1 was *cost of housing*, which refers to concerns about the cost of affordable housing for constituents and the perception that rental and home ownership opportunities are not affordable. It was mentioned six times in two interviews. Bessie said, "The prices of affordable units have skyrocketed, so they are out of reach for the lower income person." She further elaborated:

> There are resources that need to be dedicated solely to the assistance of getting low income families into housing. Look at the homeless. We are talking about families, who may be working, making those entry-level salaries, who are homeless, because they can't afford it. I heard the waiting list for a bachelor was 13 or 14 years long. They can't get the rental assistance that they need, so they are living homeless or doubled up, jammed up with family members or friends.

Ruth shared an example:

> We have another member who lives in and was a beneficiary of the first Hope Six project in the city and now is at the long end of that and seeing how over a 20 year period of time, how she's now being priced out of that herself. It was a really good deal early on but now, 20 years into that, it's getting to be very difficult to stay there.

Results of the Follow-Up Survey indicate the validity of the interview findings. Item Q2 asked respondents to rate their level of agreement or disagreement with the statement that, "There are concerns about the rising cost of affordable rental housing for my constituents" (Appendix D, Q2). All respondents noted strong agreement with the statement.

Lack of Housing

The next theme for Research Question 1 was *lack of housing*, which refers to lack of available housing for stakeholders and to a lack of rentals or ownership properties. This theme was mentioned five times in three interviews. Bessie said,

> We're very supportive of rental housing activities. We see a huge need for it. I'm working with some populations now from a site that was demolished and being replaced with new housing, mixed income housing. Although the residents are supposed to have first priority, they have not developed enough low-income rental units for all the residents to

> come back. We have been advocating for more rental units from this developer and the program that's being supported by the district.

She later stated,

> The challenge that we're dealing with now is the gentrification movement in the district. There are so many people who are coming in from outside the district who are seizing these opportunities that were otherwise dedicated to the very low income. It's a challenge to get all of our lower income residents served now through these programs. I think that's the biggest problem. There's so much competition for these units.

Ruth also mentioned the challenge of the lack of housing:

> Number one, preserving the affordable units that are already in our buildings as pressures to sell, the issues I talk about, if we can't preserve the current affordable units because buildings get sold and they all go market rate, that's a big challenge.

Patrice felt that there was a lack of housing associated with affordable home ownership, "I think that there is a greater propensity to push people into rental affordable housing versus affordable housing homeownership opportunities."

Results of the Follow-Up Survey (Appendix D) indicate the validity of the interview findings. The first item (Q1) asked respondents to indicate level of disagreement or disagreement with the statement, "there is serious concern about the lack of available rental housing for extremely low-income households in the community in which my organization resides." Two of the three participants indicated they strongly agreed with the statement, and one respondent indicated they agreed. None indicted strong disagreement, disagreement or neutrality.

Size of Housing

The next theme for Research Question 1 was *size of housing*, which refers to the perception that housing size is inadequate. This theme was only mentioned one time in one interview. Bessie said,

> The unit sizes are smaller. Most of the lower income families that we have need at least two or three bedrooms. They are building one or two condo-type units so they are just cut out of the availability of the units that are being developed.

Size of housing was not included as an item in the Follow-Up Survey (Appendix D). As described further in the discussion and conclusion, size of housing is an intriguing issue, since it hinges on the fit between number of bedrooms and family size of ELI residents, and thus it is driven to a large degree by the differences between CDC and developer goals. As such, it represents a possible topic for further, targeted research in the future.

Matching Goals

The next theme for Research Question 1 was *matching goals*, which refers to concern about organization goals being inconsistent with those of the community. This theme was mentioned one time in one interview. Ruth explained that the goals and vision of the organization and community do not always match in the following illustrative quote:

> We are a diverse neighborhood racially and culturally, but economically, we want to make sure that we stay diverse. I think we're trying to figure out as we go how common a sentiment that will be. We're not sure whether we're going to wind up being a small...right now, we think we're near the sentiment of this neighborhood.
>
> But as all these new residents begin to pour in here, mostly young professionals, we don't know whether they will share that same vision. They will be the new community and we want to make them our clients. It's really trying to grow our client base, people who share our vision.

The results of the Follow-Up Survey replicate the presence of concern for the issue of matching goals, as well as the lack of comprehensive interest in it. The issue was represented via item Q5, “There are concerns about organization goals not being aligned with those of the community” (Appendix D). Two of the three respondents indicated they agreed with the statement. One of the three respondents indicated disagreement. No respondents indicated strong agreement or disagreement and none remained neutral.

Results for Research Question 2

Research Question 2: *How does the executive staff from the three CDCs interpret the frameworks of the LIHTC, HPTF, and HOME policies in regard to affordable rental housing for ELI households*? The researcher had hoped to interview additional staff members at each of the CDCs, but the current economic conditions meant that few staff members exist and those who are working with the CDCs have limited availability.

The four primary themes related to this research question are summarized in this section. This section includes tables summarizing the definition of the identified themes, the frequency of occurrence for the themes and subthemes, as well as the number of interviewees that mentioned a specific theme and subtheme. As reflected in Table 8, the primary themes were *policies are difficult to use*, *policies are beneficial*, *problems and fraud*, and *lack of availability*.

Table 8: Themes and Definitions for Research Question 2

Theme	Definition
Policies are difficult to use	Refers to the perception that the policies are difficult to use, manage, or qualify for.
Policies are beneficial	Policies and programs are beneficial and useful for those who qualify for them.
Problems and fraud	Policies and programs have a great deal of problems; one of which is fraud
Lack of availability	The availability of programs and policies fluctuates.

Table 9 shows the frequency with which the themes appeared across interviews and across the data.

Table 9: Frequency of Themes for Research Question 2

Themes and Subthemes	Number of interviewees mentioning this theme	Total exemplar quotes
Policies are difficult to use	3	5
Policies are beneficial	2	4
Problems and fraud	1	1
Lack of availability	1	1

Policies are Difficult to Use

Policies are difficult to use was a common theme for Research Question 2, which refers to the perception that the policies are difficult to use, manage, or qualify for. It was mentioned five times in three interviews. Bessie explicitly stated the policies were "Complex. Confusing. Difficult to attain and administer." She also said, "They are long-term management policy and meeting policy. Those are very difficult, long-term, highly regulated, sometimes ridiculously regulated programs to manage." Ruth further indicated that such programs were difficult to administer:

> No, we tried about three years ago to work with Manna to develop a home buyer's club. Manna runs this themselves up in Northwest near their headquarters, and they do that to help folks that are considering moving into these low-income home buyer programs. And we were not able to get enough interest and commitment of residents to start a club. We had to drop the plan. In fact, Manna came down to us and said that they were running into issues with these low income home buyer programs themselves, that the home buyer program is not really well designed, and that they were even having trouble finding people to qualify for some of the low income programs.

She also shared, "They said that the contracts were just really challenging, really, really challenging, to qualify for." Patrice indicated some of the programs were difficult to qualify for by saying, "When you live in a city where people are dropping out of high school and don't have

a skill, then they have to compete with people that have master's degree for the same mailroom job. It is very difficult.

Interestingly, responses to the Follow-Up Survey (Appendix D) do not endorse the validity of the interview findings in a straightforward way. Item Q6 ("The Low-Income Tax Credits, HOME program, and the Housing Production Trust Fund are difficult for my organization to use to provide affordable rental housing for my constituents") elicited three separate responses: one out of three respondents indicated agreement, one out of three indicated neutrality, and one out of three noted disagreement. The disparity may stem from wording of the item. The item was formulated to capture assessments of specific policies and programs that have particular relevance to the provision of housing to ELI members of the District. However, these are not the only programs that figure into respondents' assessments of the ease or difficulty of implementing policies. As noted above, for instance, Ruth spoke extensively of difficulties with regard to jump-starting a homebuyers club through a partnership with the non-profit Manna.

Policies are Beneficial

The next theme for Research Question 2 was *policies are beneficial*, which refers to policies and programs being beneficial and useful for those who qualify for them. This theme was mentioned four times in two interviews. Bessie explained the benefit of the programs:

> The benefit is that it is supposed to reduce the cost of housing for people. That's the benefit. I think that makes the struggle of attaining those resources worthwhile. You have to look at the end result that would otherwise not be available.

Ruth felt such programs might be beneficial for future use:

> Intermediary, right. Again, we're not a developer, so we never were in a position to be able to utilize those, but we understood how critical they were to developers getting the deals. We've been looking at them... I mean, my other hat is as a pastor, and our church has understood that the low-income tax credits might be something we can use if and when we develop our property. It includes some housing in it.

Results from the Follow-Up Survey (Appendix D) suggest the validity of the interview findings. Item Q7 asks respondents to indicate their level of agreement or disagreement with the statement that "The Low Income Housing Tax Credit, HOME, and the Housing Production Trust Fund programs are useful and beneficial to organizations who have the capacity to implement them." Two of the three respondents agreed, and one strongly agreed, with the statement.

Problems and Fraud

The next theme for Research Question 2 was *problems and fraud*, which refers to the perception that policies and programs have a great deal of problems, one of which is fraud. This theme was mentioned one time in one interview. Ruth said,

> DC housing claims that they did that. With those 700 families, for instance, of course they were...In the Hope Six project there was a huge contract that was let out, a multi-million dollar contract let out to manage that whole dislocation, relocation process. It seemed like such a scam. In other words, we really believed that there might have been some actual fraud in the whole deal.

Results from the Follow-Up Survey (Appendix D) generally underscore the validity of the interview findings with regard to the question of perceptions of fraud. Two of the three respondents agreed with the statement "There is a perception fraudulent activities regularly occur in the implementation of affordable housing programs" (Q8). One of the three respondents disagreed. Because the issue of fraud was only mentioned once across the interviews, the pattern of survey responses provides a basic fit with the results from an analysis of clustered interview themes.

Lack of Availability

The next theme for Research Question 2 was *lack of availability*, which refers to the perception that the availability of programs and policies fluctuates. This theme was mentioned one time in one interview. Ruth said,

> We have a board member...I mean, not a board member, but in our own...more in my other hat, we've done more looking into it specifically, because we were actually working with a developer who...so we understood that there were a lot of constraints on it, that even to get in line for it, and they don't get released that often. It's not like they're just always available, was my understanding too. They get given out at certain periods, and then the city doesn't give them for a while, and then they get some other things in line.

The question of availability was posed in the survey in terms of the perception of fluctuations: “There is a perception that program funding fluctuates and is inconsistent" (Appendix D, Q9). All respondents marked agreement with the statement. This would indicate potentially a stronger rate of concern over the topic than emerged in the interviews; however, it does not pose a direct challenge to the validity of the results of the interview analysis. The straightforward interpretation would be that Ruth was the only respondent to mention the issue as a problem, but that all respondents are aware of at least the perception that the problem exists. The fact that respondents noted agreement, rather than strong agreement, with the item tends to confirm this conclusion.

Results for Research Question 3

Research Question 3: *What are the common values that shape the behaviors of street-level bureaucrats within the CDC*? The five primary themes related to this research question are summarized in this section. This section includes tables summarizing the definition of the identified themes, the frequency of occurrence for the themes and subthemes, as well as the number of interviewees that mentioned a specific theme and subtheme. As reflected in Table 9, the themes are *help constituents locate housing*, *be community driven*, *express concerns for others*, *develop affordable housing*, and *economic diversity*.

Table 10: Themes and Definitions for Research Question 3

Theme	Definition
Help constituents locate housing	Refers to helping those in need find housing
Be community driven	Refers to being driven by the needs of the surrounding community rather than others.
Express concerns for others	Express concern for constituents
Develop affordable housing	Develop affordable housing for all
Economic diversity	Ensure the community reflects economic diversity

Table 11 shows the frequency with which the themes appeared across interviews and across the data.

Table 11: Frequency of Themes for Research Question 3

Themes	Number of interviewees mentioning this theme	Total exemplar quotes
Be community driven	3	7
Help constituents locate housing	2	3
Express concerns for others	1	2
Economic diversity	1	2
Develop affordable housing	1	1

Be Community Driven

The most frequently occurring theme for Research Question 3 was *be community driven*, which refers to being driven by the needs of the surrounding community rather than others. This

theme was mentioned seven times in three interviews. Bessie explained how her organization meets the needs of the community,

> We have a variety of programs based upon the needs of the residents. We have educational type programs, financial literacy, home ownership education. We do small business training. Whatever the need is socially and economically, we provide that through a case management model where we serve the families one on one.

Ruth shared,

> We're really trying to serve the current residents of this community. As this whole area goes through redevelopment, we want to make sure that the current residents, as much as possible, have first rights to the benefits that are coming along. We just are trying to figure out the mechanisms to do that.

Patrice explained how her organization has focused on community needs:

> When we started in this community 25 years ago, we started out work at a transitional shelter for homeless families, recognizing that it was just a catch-22 when the people that were living in the shelter would get a public housing voucher or a Section 8 certificate. Then that contractor would hire that person to come back to be the counselor to the new tenants in that shelter, and then they would begin to go...When somebody donated things, that employee would take the best of the crop and give the people there what's left over after that.
>
> It became a "the oppressed became the oppressor" situation. We felt that we needed to level the playing field by coming in a community and looking at what the housing stock was here, and trying to revamp it to make more affordable opportunities available. We've been working for 10 years on one project. The project went from a homeownership project with 51 affordable condominiums in it. Then the market crashed, so we had to redesign the model. It became a New Markets Tax Credit model that would have 28 condominiums and then 12,000 square feet of office space and 6,000 square feet of new retail space.

Results to the Follow-Up Survey (Appendix D) confirm the validity of the findings based on analysis of clustered themes in the interviews. All respondents noted they “strongly agree” with the statement that “CDC employees must be driven by a desire to help the community they serve” (Q11). This was just one of two items where all respondents noted strong agreement. It is not surprising, therefore, that the issue had such a strong presence across the interviews.

Help Constituents Locate Housing

The next theme for Research Question 3 was *help constituents locate housing*, which is defined as helping those in need find housing or prepare to buy housing. This theme was mentioned three times in two interviews. Bessie mentioned, "The primary focus of my job is to provide services and support that would help the very low-income persons obtain affordable housing opportunities and economic self-sufficiency opportunities." Patrice explained how her organization helps,

> Well, with our sister organization, Lydia's House is a full-service housing counseling agency providing the counseling services and the financial literacy services, preparing people for their future, and helping them get credit together. DC has a strong Home Purchase Assistance Program, where we're working with our clients to get their credit scores up to 600 so that they'll qualify for a commercial loan. I think providing those services to them is helpful. It doesn't matter whether they're going to come and buy my properties. They'll be prepared to buy any property.

This item was not included in the Follow-Up Survey.

Express Concern for Others

Express concern for others was another common theme for Research Question 3. This subtheme refers to expressing concern for constituents. It was mentioned two times in one interview. Bessie shared,

> We have a variety of programs based upon the needs of the residents. We have educational type programs, financial literacy, home ownership education. We do small business training. Whatever the need is socially and economically, we provide that through a case management model where we serve the families one on one.

She later said, "That's an interesting question. Most people, with whom I associate, that are really interested are people who have a personal concern for the well-being of others."

In response to the Follow-Up Survey (Appendix D) all respondents noted strong agreement with the statement of item Q12, "Expressing concern for constituents is a necessary

quality for an employees of a CDC." Hence there is reason to believe concern for others is perceived to be a widely shared value, although it emerged directly in just one of the interviews.

Economic Diversity

Economic diversity was defined as ensuring the community reflects economic diversity. It was mentioned two times in one interview. Ruth explained,

> Oh, OK. I think, yeah, we're still at the level of just even being able to communicate what our vision is. Even in our mission statement, we talked about maintaining the diversity of the neighborhood, and one of the ANC commissioners, he said, "I was kind of confused by your statement about diversity." He said, "This neighborhood seems very diverse," and we... And then I spelled out that we want economic diversity, is what we're really talking about.
>
> We are a diverse neighborhood racially and culturally, but economically, we want to make sure that we stay diverse. I think we're trying to figure out as we go how common a sentiment that will be. We're not sure whether we're going to wind up being a small...right now, we think we're near the sentiment of this neighborhood.

Economic diversity was addressed in the Follow-Up Survey through item Q13 (Appendix D), which asked respondents to rank their level of agreement or disagreement with the statement, "CDC employees work to ensure the community reflects economic diversity. One respondent strongly agreed, one agreed, and one remained neutral. The wording of the statement was not intended to inform the validity of interview findings concerning diversity; instead, it was used to add additional insight into whether or not respondents believed this was an important aspect of employees' mission. Results suggest that it is. There was no disagreement. Moreover, the statement was worded to reflect actual practice rather than desired practice. Therefore, the response suggests that street-level bureaucrats from at least two CDCs perceive that employees of their organizations make fostering or maintaining economic diversity a priority.

Develop Affordable Housing

The next theme for Research Question 3 was to *develop affordable housing*, which refers to focusing on the development of affordable housing for all. This theme was mentioned one time in one interview. Bessie explained her dedication to developing affordable housing:

> There is still a huge need out there that I'm personally committed to. It's my philosophy. That's what I do. That's what I've always done. That's why I do it. That's my motivation to try to get as many low-income people into housing opportunities as possible, using whatever resources are there and also advocating on their behalf. People and entities that can make a difference.

In the Follow-Up Survey (Appendix D), two respondents strongly agreed with item Q10, "A desire to help constituents locate affordable housing is a common value among street-level bureaucrats who work at CDCs." One respondent disagreed. The response generally accords with the fact that one respondent mentioned this value in her interview and described it as a personal motivation, rather than a necessary value among all CDC employees.

Results for Research Question 4

Research Question 4: *To what extent are street-level bureaucrats' decision-making and authority limited within the CDC*? The three primary themes related to this research question are summarized in this section. This section includes tables summarizing the definition of the identified themes, the frequency of occurrence for the themes, and the number of interviewees that mentioned a specific theme. As reflected in Table 11, the primary themes were *limited to advocacy*, *limited to developing housing*, and *limited by availability of financing/funding*. In the SLB Follow-Up Survey (Appendix D), limitations on authority and decision-making were addressed through a single item, Q14, "My authority and decision making is limited by the availability of financing/funding for affordable rental housing." One respondent strongly disagreed with the statement while two agreed.

Table 12: Themes and Definitions for Research Question 4

Themes	Definition
Limited to advocacy	Authority and decision making limited to negotiating and advocating on behalf of constituents
Limited to developing housing	Authority and decision making limited to developing housing
Limited by availability of financing/funding	Authority and decision making limited by availability of funding

Table 13 shows the frequency with which the themes appeared across interviews and across the data.

Table 13: Frequency of Themes for Research Question 4

Themes	Number of interviewees mentioning this theme	Total exemplar quotes
Limited to advocacy	2	4
Limited to developing housing	2	4
Limited by availability of financing/funding	2	3

Limited to Advocacy

The next theme for Research Question 4 was *limited to advocacy*, which is defined as authority and decision making being limited to negotiating and advocating on behalf of constituents. This theme was mentioned four times in two interviews. Bessie explained how her organization advocates:

> Our advocacy for home ownership is still for that same population, the very low income. Over a five-year period that we have these families, we try to build them economically so that they can be afforded home ownership opportunities as well, especially with the subsidies that are out there to help them become... The Home Housing Choice voucher program is out there. We have some people, very low-income people, who are now homeowners because of that. The HHAP program, Home Housing Assistance program that the city offers, and then the housing authority here is a third trust to make up that gap, financing for people who would otherwise not be able to afford home ownership. We advocate for both.

Ruth shared how her organization advocates and negotiates:

> Well, again, this organization is not a service-providing program, nor do we construct anything. What our work is involved in is helping to negotiate affordable housing covenants with developers who are moving and building in the neighborhood, and it's also enforcing agreements that those developers have made with the city, if the city has required that whatever percentage.

She continued:

> We're also advocates in the situations where there's a difference of opinion between historic preservation and affordable housing. We have a recent situation where another neighborhood organization designated a building as historic, which is causing some problems for the tenants who are trying to buy that building under the TOPA laws with their developer because their plan for doing some renovations to the building that would allow them to get the financing that they want is a little bit in jeopardy.
> So, we do advocacy work on behalf of them in fighting delays, which might come through historic preservation oversight.

Limited to Developing Housing

The next theme for Research Question 4 was *limited to developing housing*, which refers to authority and decision making being limited to developing housing. This theme was mentioned four times in two interviews. Patrice said, “On a very small scale. We, in the '90s, bought buildings, and were a HUD affordable housing developer, and bought HUD properties and remodeled them with a 203(k) program.”

She further explained:

> We formed the CDC in response to the blight and boarded up housing in our Bellevue community. We formed it to do exactly that. It took us a while to be able, as a new CDC, to acquire the financial backing to acquire the sites that we are using as our development

> project. We're very narrowly focused on what it is that we're doing. That's developing housing in this part of the city.

Bessie shared:

> We're co-developers with some private developers. We actually build housing; have built housing from the ground-up. We have actually demolished distressed public housing, and replaced it with in-partnership joint ventures with some private developers, and some national foundations, like the enterprise foundation, to redevelop distressed public housing communities.

Limited by Availability of Financing/Funding

The final theme for Research Question 3 was *limited by availability of financing/funding*, is defined as authority and decision making being limited by availability of funding. This theme was mentioned three times in two interviews. When asked, do you reward some of these employees for coming up with a new idea, Bessie said, "Externally, there were a lot of forces at one time, but I see that they have diminished financial resources. There are strong advocates for that. I see that those external forces have diminished greatly." Patrice explained,

> Well, the bottom line is always the financing in whatever deal you're going to do, because with the Low-Income Housing Tax Credit deal you need to have, it's easier to get an equity investor and the person to buy the tax credit from you than it is when you want to do a home ownership project and you're developing condos. Because of the crash in the market in 2008, financial institutions don't want to finance condos right now. They're making it more difficult to get financing for projects that will have condos in it.

When asked if she felt her decisions are limited by the funds that are available in the marketplace, she said, "Of course."

Conclusion

Four research questions were explored in this dissertation. Over the course of my interviews I encountered several examples of goal incongruence, uneven implementation, and discretionary enforcement of the affordable housing programs that were part of this study. Surprisingly, CDC staff at the three Ward 8 CDCs clearly understood that, as street-level bureaucrats, they occupy a space between the government and the public that they serve. When asked about why more affordable low

income housing was not being produced by their organizations, they spoke candidly about being hindered by a lack of resources and a lack of support by the current local administration. In spite of their frustration, the findings demonstrated that CDC staffs remain committed to continuing their efforts to provide affordable rental housing to low income residents in the District's Ward 8.

CHAPTER VI: CONCLUSION AND IMPLICATIONS

> [Our programs are] supposed to reduce the cost of housing for people. That's the benefit. I think that makes the struggle of attaining those resources worthwhile. You have to look at the end result . . .
>
> - Interview with respondent Bessie

Introduction to the Findings

Questions of low-income housing have taken on unprecedented importance in recent years. Since the early 1980s, the federal government has progressively retrenched from its commitments to ensuring the availability of housing for extremely low-income (ELI) residents (Pickman et al., 1986; Wylde, 1999). Responsibilities have devolved to the regional, state and local levels, and the sector has been marked by increasing reliance on for-profit organizations to provide both the housing stock and services that ELI residents require (Pickman et al., 1986; Wylde, 1999; Smith, 2000). However, the federal subsidies needed to make such programs work have been in decline, and as a result, the Community Development Corporations (CDCs) that originally possessed a broad mandate to help build stronger and healthier communities are now often forced to concentrate their efforts on tasks such as fundraising and partnership building (Brathwaite, 2005; HUD, 2011). As a net result, efforts have fallen short. For instance, in the City of Chicago it was already clear by 1998 that federal assistance would be insufficient to allow the City to come close to reaching its goals of providing badly-needed housing to ELI residents (City of Chicago, Department of Housing, 1998).

With the housing market collapse of 2007, the pressures faced by CDCs became even more extreme. Even projects that were underway often had to be shelved or substantially reconfigured (e.g., as Patrice noted in her interview, the market crash forced the redesign of a

project with 51 condominiums geared for affordable homeownership to a mixed-use project with just 28 condos). The project had already been in the works for ten years before the crash, and it had been the subject of much wrangling and negotiation. The collapse of the housing market bubble meant that, after all those years of effort to maneuver and push the project forward, it was possible to create just over 50% of the original units envisaged. Not surprisingly, as of 2011, less than half of ELI residents of the District of Columbia (the District) were likely to be able to access safe, decent, and affordable housing (District of Columbia, Department of Housing and Community Development [DHCD], 2011).

This dissertation addresses the issue of affordable housing in the District by examining the role of a key part of the CDC apparatus: the Corporations' day-to-day decision-makers, the individuals that Lipsky (1980) referred to as street-level bureaucrats. Street-level bureaucrats are actors who, in Lipsky's (1980) formulation, possess inadequate resources and are often overloaded with casework. Their clients are typically non-voluntary—as in government programs for the poor—and the bureaucrats themselves may possess vague, ambitious, or conflicting goals with regard to their duties to clients and to the state, their boards, or other stakeholders (Lipsky 1980). Street level bureaucrats are often charged, moreover, with implementing ambiguous policy goals, legislation, and regulations, in contexts that typically offer little overt support for autonomous interpretation and decision-making (Lipsky, 1980).

In a sense there may be no more perfect embodiment of Lipsky's (1980) ideal type than the District's Ward 8 CDC staffer, who typically must face a constant shortage of resources; help low-income clients who are sent to them by the state; and apply incomplete and/or ambiguous mandates across several distinct contexts as they partner with private developers and NGOs. The complexity of the CDCs' task, along with the absence of a central, unifying ideological

framework to U.S. housing policy, creates situations in which SLB discretion in decision-making gains heightened salience and goal congruence becomes both more important and more elusive (Lundin, 2007, Meyers, Riccucci, & Lurie, 2001Swanstrom & Koschinsky, 2000 Leigh, 1998).

The focus on street-level bureaucrats within the CDCs is important for two reasons. First, understanding their modus operandi offers a critical opportunity to understand how the CDCs are faring and what their needs are at a time of unprecedented challenge. As Lipsky (1980) so importantly noted, there is never a straight line between policy formation and policy implementation. Even if street-level bureaucrats are not seen as policymakers—or do not see themselves as occupying that role—they are forced to creatively engage with policy, to interpret and apply it, often in conditions of scarcity. As a result, they are on the frontlines of determining, in a real and embodied sense, what housing policy looks like for ELI populations in Ward 8 of the District.

On one level, then, an investigation that applies Lipsky's (1980) theory of the street-level bureaucrat can help to illuminate the question of housing development and availability for ELI residents in the District. However, second, an exploration of street-level bureaucrats within the District's CDCs arguably can help to enrich and enlarge upon Lipsky's (1980) original formulation. This in turn can contribute to a heightened understanding of bureaucratic behavior overall and allow for the emergence of tentative findings that may be tested in other areas of policymaking.

In order to gain analytic purchase on the phenomenon of CDC street-level bureaucrats, this study selected three District CDCs, all from Ward 8, where there is a markedly higher concentration of renters than for the District overall (77% renters for Ward 8, as compared to 59% for the District), and markedly lower income levels (DCHD, 2011). CDCs selected for

analysis comprised: the Wheeler Creek Community Development Corporation (WCCD), Lydia's House, and the Congress Heights Community Training & Development Corporation (CHCTDC). The goal was to understand how actors within these three CDCs who match the basic description of street-level bureaucrats interpreted their mandates and implemented policy.

Four basic research questions were posed, each of which operationalizes and applies key aspects of Lipsky's (1980) observations concerning the gap between policy formation and policy implementation. First, the study asked: *What concerns do street-level bureaucrats within the three CDCs have regarding their capacity to meet the housing needs of ELI households*? Second, the study asked: *How do the staffs from the three CDCs interpret the frameworks of the LIHTC, HPTF, and HOME policies in regard to affordable rental housing for ELI households?* Third, the study sought to ascertain the common, guiding values that shape the behaviors of street-level bureaucrats within the studied CDCs by asking the following question: *What are the common (consensus or conflicting) values that shape the behaviors of street-level bureaucrats within the CDCs?* Fourth and finally, the study posed this question: *To what extents are street-level bureaucrats' decision-making and authority limited within the CDC?*

As has been emphasized throughout the dissertation, and as will be readily observable by the reader, Lipsky's (1980) framework demands that the researcher explore the *meanings* that street-level bureaucrats assign to policies, as well as the values and other subjective norms they bring to the task of policy implementation (see also Wilson, 2000, on the increased role of individual attitudes in contexts that lack high definition for goals and tasks). Accordingly, this study drew on Yanow's interpretive policy analysis framework. Yanow (2000) specifically built on Lipsky's (1980) theory of street-level bureaucrats, drawing out the meaning- and values-based components of the implicit or explicit interpretive roles that bureaucrats play as they set

about implementing policy. She proposed that the researcher should seek to identify four distinct components of the street-level bureaucrat's lifeworld: 1) the artifacts, defined here comprehensively to include language, objects and acts, as well as communities of meanings (i.e., groups of relevant stakeholders) that comprise the street-level bureaucrat's basic arena of action; 2) the meanings that are communicated by and through the artifacts; 3) the institutional discourses and other conceptual sources of such meanings; and 4) the ways that meanings are negotiated and mediated as the street-level bureaucrat attempts to bridge differences such as the difference between the policy ideal and the nitty-gritty, day-to-day level of applying rules and pursuing goals (Yanow, 2000).

Yanow's (2000) rich conceptualization pushed toward a multi-pronged interpretive approach in the research. The core instrument for gathering findings was a semi-structured, open-ended interview. Interview results were supplemented with meeting notes, historical documents, and a follow-up survey of interview respondents. Three respondents, one from each CDC, were interviewed and surveyed.

Discussion of Findings

Several things stand out in the findings. The first might have been entirely expected, yet clearly merits discussion and contextualization. This first, most basic finding is that lack of support for housing, and lack of actual housing, together dominate the list of concerns expressed by street-level bureaucrats. It is important to note, however, that while the two thematic clusters are related, they are not the same. The first—lack of support for housing—was the most frequently mentioned, with eight exemplar quotes across all three interviews, and it was echoed in supporting sources as an important theme.

Lack of support for housing is a broader issue than lack of housing, and it encompasses three sectors: government funders who do not supply adequate resources for either the development of housing stock and/or support services essential to helping new tenants manage their affairs; developers, who often are not interested in rental housing, let alone low-income rentals; and lack of tenant interest and knowledge (see, e.g., interview with Bessie). Support services and tenant education appear to be one of the key placements, at least in the eyes of street-level bureaucrats at the CDCs. Indeed, training for tenants was mentioned in some form eight times over the course of the three interviews. Other tenant support services comprise material services such as provision of furniture (e.g., note Ruth's story of a tenant who waited for a long time for Hope Six housing, but when she finally attained it, she had no furniture to put into the new apartment, and effectively was unable to inhabit it for that reason). Tenant support and training include, as well, programs that help new ELI households manage their money, pay bills on time, connect to work and other services, and integrate into the community. Crossing into the territory of Question 2, concerning application of policy, an interesting connection can be made between the articulated need for support services/training and the issue of tenant and homebuyer awareness. Ruth described at length the situation of a crossover program with Manna, a non-profit organization that runs homebuyer clubs that offer peer-to-peer counseling, savings programs, and other forms of collective support to enable ELI residents to work toward purchasing their own homes (Manna, 2013, n. pag.). In order to form a successful club, there must be a critical mass of interested potential buyers; however, at the time of the interviews, Manna and the CDCs were having trouble generating enough interest and commitment among qualifying District residents. An ancillary problem was that some interested residents were not able to qualify for the particular low-income standards for the homebuyer club program. This is an issue of policy

alignment more than resident outreach, though potentially it may blur over into questions of how potential members understand and complete paperwork.

The Manna program is useful to link to the predominant interest in tenant education and support services revealed in the interviews. As Lipsky (1980) so persuasively argued, street-level bureaucrats often face conflicting ideas concerning their roles and mandates, and they themselves may bring conflicting or ambiguous agendas to the table (see also Cummings & DiPasquale, 1998). The question here becomes whether raising ELI population awareness of the advantages to coordinated action—arguably a form of social mobilization as much as training and education—is within the proper bailiwick of CDC street-level bureaucrats. Manna, the non-profit, represents one of its major goals in this way:

> Manna recognizes that one of the most important aspects of its work is providing the educational opportunities to encourage lower-income families to believe they can own a home of their own. James A. Johnson, former Chairman of the Fannie Mae Foundation reflected on his ten years as chairman and said, "I've learned that one of the most powerful things we can do to increase homeownership is to provide people with the information they need to understand the housing finance system. Since we began our outreach in 1994, the percentage of African Americans who say they are 'comfortable' with their knowledge of how to buy a home has risen by 68 percent. We believe there is a clear link between the rising rate of minority homeownership and the greater degree of comfort minorities have with the home-buying process" (Manna, 2013, n. pag.).

However, it is one thing for an organization such as Manna to perceive its role in this way, and another for CDC members to—particularly given the link to Fannie Mae and the now-precarious politics of encouraging home ownership (rather than rental) among ELI clients in the

wake of the housing collapse. The line between education and support and actual social mobilization or political organizing may be a fine one. Moreover, the dual heritage and role of CDCs—as mechanisms of empowerment for communities and residents, on the one hand, and as landlords and developers, on the other—may create conflicting signals as to the proper role of CDCs in addressing issues such as this (Gittel & Wilder, 1999). Arguably, then, not only are more resources for tenant and resident support services needed, but policymakers would do well to work toward a more direct and clear delineation of what the role of the CDCs should be concerning encouragement of home ownership.

A second notable finding emerges with regard to what did *not* garner strong thematic response clusters with relation to the first research question. Specifically, housing size and "matching goals" were each mentioned just one time in one interview each. Housing size here is a straightforward issue—indicating that square footage available to ELI residents may be inadequate. Matching goals refers to the perceived fit between CDC goals and community goals. The fact that each was mentioned just once raises questions rather than suggesting conclusions. It is possible that in one or both cases the responses reflect an accurate reading of resident and community sentiment. It could equally be the case that they reflect points where perceptions of street-level bureaucrats are out of alignment with resident and community sentiment.

Lipsky (1980) noted there is a reactionary tendency among street-level bureaucrats in many cases. It seems possible that, for instance, lack of attention to the question of square footage reflects a reactionary stance vis-a-vis clients, particularly in a time of shrinking resources: in the eyes of the respondents, simply having safe clean housing should be the focus; not the size of the units. It is noteworthy that only one respondent, Bessie, noted "unit sizes are [becoming smaller]." This is not simply a question of appeal or "luxury," as her comments make

clear, since most ELI families within the purview of the CDCs' work need two or three bedrooms in order to house their families (see interview with Bessie). Yet developers are more interested in constructing one- or two- bedroom units. Hence, larger families may well be functionally shut out of such housing opportunities. The fact that the issue of housing size did not emerge, aside from this mention by one respondent, may also indicate the CDC imperative to partner with private developers, which entails taking on their perspective to some degree.

A community survey on this issue could, in further research, help to elucidate whether CDC bureaucrat and ELI client sentiments are in accord on this point. ELI residents may well be more acutely aware of the mismatch between housing size and housing needs. It might also be useful to probe, in further work, first, whether or not a sentiment against large ELI families, conscious or unconscious, underwrites lack of attention to the issue among CDC street-level bureaucrats, and second, the degree to which the priorities of private developers influence CDC staff perceptions of various concerns.

An intriguing additional aspect of the issue of goal matching arises in conjunction with the SLB Respondent Follow-Up Survey. SLB Follow-Up question 5 sought level of agreement with the statement "There are concerns about organization [CDC] goals not being aligned with those of the community" (see Appendix D). Just one respondent made one mention of this issue across the interviews. This was Ruth, who noted the issue with regard to maintaining economic diversity. Thus, the question of goal matching is linked, implicitly, to the issue of gentrification, as attention is focused on the creation of mixed income housing. Ruth ventured that for now there seems to be community goal matching (see interview with Ruth). However, in response to Question 5, two respondents noted Agreement with the statement that there are concerns about lack of goal alignment between the CDCs and the community.

Meanwhile, the question of whether CDCs are or are not (or should or should not be) involved with forging economically diverse communities is one that appears to be deserving of follow-up research. Note that in the interviews this issue was raised in terms of *maintaining* diversity, as per the comment:

> We are a diverse neighborhood racially and culturally, but economically, we want to make sure that we stay diverse. I think we're trying to figure out as we go how common a sentiment that will be. We're not sure whether we're going to wind up being a small...right now, we think we're near the sentiment of this neighborhood (Interview with Ruth).

Ruth's comment articulates with a sense that there must be room for ELI residents in a neighborhood as it begins to flourish economically, an issue that is made more acute given the overall emphasis on mixed-income housing units produced through public-private partnerships. Behind Ruth's statement is a sense that CDCs, within the new paradigm, may inadvertently contribute to gentrification and the loss of affordable spaces for ELI residents, an instinct borne out by research in communities where gentrification followed quickly on the heels of CDC successes (Adams et al., 2008; Freeman, 2005). CDCs may thus find themselves in the position both of struggling to develop mixed-income housing opportunities (where units for ELIs may be few) and to enlarge the scope of ELI opportunities. In other words, their own efforts may be in tension.

Note that the issue of *economic diversity* merited just two exemplar quotes across one interview—Ruth's. Meanwhile, with regard to Item 13 of the SLB Respondent Follow-Up Survey, there was a notably wide diversity of opinion. Regarding the statement "CDC employees work to ensure the community reflects economic diversity," one respondent noted, "strongly

agree," one marked "agree," and one indicated "neutral." This is, in fact, one of just two items on the instrument that elicited such complete diversity of opinion. Two conclusions are warranted here. The first is that this is an additional area where conflicting goals and values come into play among street-level CDC bureaucrats—as well as an area where further policy delineation and efforts at goal congruence may well be required (Lundin, 2007; Orlebeke, 2000). The item also indicates that this is an issue ripe for follow-up inquiry. As mixed housing becomes an increasingly desired goal in the sociological literature (Smith CITE), as well as a goal compatible with public-private partnerships (which are themselves often spurred on by zoning incentives for mixed-income housing), the question of gentrification arises in ever-sharper ways. It could be very useful to gain a deeper understanding of how CDC street-level bureaucrats in a wider number of contexts view their roles vis a vis the dynamics of gentrification in communities that have been dominated by ELI residents. While working with private partners, Ward 8 CDCs often change both the mix of affordable housing and the target population – yielding the connection between goal congruence and SLB.

Finally, another striking element of the findings resonates with Lipsky's (1980) observations concerning the conflicting perceptions that street-level bureaucrats bring to their work. This has to do with their understanding of policies. At first glance there seems to be something of a division or contradiction in the findings. On the one hand, five exemplar quotes across three interviews attested to a sense that policies such as the LIHTC, HPTF, and HOME are "Complex. Confusing. Difficult to attain and administer" (see interview with Ruth). Indeed, Ruth went so far as to note that the programs are "sometimes ridiculously regulated programs to manage." Simultaneously, however, there was fairly solid agreement that the programs and policies are beneficial. This conclusion is drawn from the presence of four exemplar quotes

across two interviews, as well as responses to the Follow-Up Survey. In the survey, two respondents agreed, and one strongly agreed, with the sentiment that these programs are useful and beneficial. Again, at first glance, this might seem to be in some tension with the widespread understanding that the programs are so burdened with oversight and regulatory requirements that they become unwieldy to administer. How can they be so unwieldy, and yet simultaneously so beneficial? According to Eugene Boyd (personal communication, June 19, 2014), public policies intentionally have vague and ambiguous goals. Particularly as it relates to affordable housing policies, the implementation affects how well policies are accepted. It was also noted that implementers are not expected to just faithfully adhere to the policy mandate but adapt to changing circumstances over time. Successful implementation of affordable housing policies depends a great deal on administrative discretion and the CDC staffer's ability to get things done.

The key to reconciling the beliefs may well lie in the wording of the item (Question 7) on the Follow-Up Survey. There respondents were specifically asked to indicate degree of agreement with the statement: "The Low Income Housing Tax Credit, HOME, and the Housing Production Trust Fund programs are useful and beneficial to organizations *who have the capacity to implement them*" (see Appendix D, emphasis added). While the combined interview and survey responses evince a measure of self-contradiction with regard to the efficacy of policies and programming, they also indicate on the whole that the key to making the programs work is building organizational capacity, so that the complexities of oversight and management do not detract from the ability of CDCs to carry out their broader missions. Another interesting finding was the lack of collaboration between the Ward 8 CDCs. The lack of collaboration, different goals, and different values (through their individual charters) provides further evidence of the disconnect and potential for policy distortion by SLBs.

Thus far the discussion has centered on insights that the study generates vis-a-vis the implementation of programs and policies. However, it is important to note that the work, reciprocally, informs the way that street-level bureaucrats—and bureaucrats more generally—may be understood. Bureaucracies are a natural response to the complexity of the modern world: as the number of policies to be implemented increases, and as populations increase, bureaucracies carry out tasks of implementation with efficiency and provision, allowing for the orderly running of the state (Coser, 1977). Simultaneously, however, bureaucracies and bureaucrats add to the depersonalization and even estrangement of life in modernity, since they must often apply general rules to particular cases.

Weber (1946) went so far as to envision bureaucracy as a kind of stultifying and dysfunctional force in modern life. Bureaucracy is unable to adapt to the particular instance (Coser, 1977). In this respect we might note that responsiveness to individual circumstances is, more or less, a predicate to humanity and dignity in daily life. Otherwise, the individual becomes just a technical matter to be addressed according to pre-set technical parameters, rather than a full human with complex needs and desires.

This take on bureaucrats can be contrasted vividly with Lipsky's (1980) theorization of the role of street-level bureaucrats. Lipsky (1980) viewed bureaucrats as introducing a reactionary element, to be sure. However, far from seeing their workings as mechanized and depersonalized (and depersonalizing), he was highly attuned to the number of irrationalities, ambiguities, conflicting pressures, and need for creative problem solving and decision making that characterize the role and lifeworld of the street-level bureaucrat, particularly in situations of resource scarcity (Lipsky 1980). This opens entirely new vistas for understanding the role of bureaucrats and bureaucracies. Rather than a faceless and direct mechanism of implementation

of policies developed from above, Lipsky (1980) allowed researchers to perceive the intensely human role of bureaucrats in refashioning policies on the fly, as it were, under the pressure of unclear or conflicting mandates.

Significance of the Research

This examination of CDC street-level bureaucrats, in turn, nudges Lipsky (1980) forward. One of the most striking findings concerns the level of commitment and social engagement that characterizes this particular cohort of respondents. This level of commitment and engagement is exemplified, for instance, by the quotation that opens this chapter, Ruth's comment that "[Our programs are] supposed to reduce the cost of housing for people. That's the benefit. I think that makes the struggle of attaining those resources worthwhile." These street-level bureaucrats are engaged in a struggle to provide what they can, given their conflicting mandates and uncertain resources. General convergence on shared values underscores this point. Two of three respondents strongly agreed with SLB Follow-Up Survey Question 10: "A desire to help constituents locate affordable housing is a common value among street-level bureaucrats who work at CDCs." The respondent who disagreed, meanwhile, indicated in other ways that such an orientation is desirable, but is not always found in the desired (to her mind) quantities.

All three respondents strongly agreed with Follow-Up Survey Question 11, "CDC employees must be driven by a desire to help the community they serve." Similarly, all three strongly agreed with the statement of Question 12: "Expressing concern for constituents is a necessary quality for an employee of a CDC." Given the small size of the sample, these responses must be interpreted cautiously. The extent to which individual bureaucrats experience attachment to the communities they serve and express respect for clients may be a product of either individual dispositions (Petter et al., 2002), or the messages communicated by

management within particular offices (Wilson, 2000), or both. Moreover, the specific Civil Rights-era heritage of CDCs as vehicles for community empowerment may be declining (Gittel & Wilder, 1999). Nevertheless, the views expressed by this set of respondents suggest a third potential understanding of street level bureaucrats, one that moves beyond both the mechanistic vision enshrined by Weber and the vision of a reactionary functionary put forth by Lipsky (1980). In certain contexts, at least, the most appropriate vision of the street-level bureaucrat may be as something of a social worker, who is driven by humane attitudes and caring for clients as s/he seeks to negotiate conflicting demands of the position. And like social workers, CDC staffs require a certain level of discretion to be successful in their work.

Given these findings, I argue that discretionary enforcement is a necessary tool for CDCs engaged in the provision of affordable rental housing. Future research should consider exactly where CDC staff exercise discretion in their work. Creating affordable rental housing, with limited resources, for poor residents in the District is a complex issue that continues to plague the participants of this study. This study further shows the importance of the roles of organizations like CDCs in the delivery of affordable housing policy. As such, this study requires that we recognize that affordable housing policies and their implementation are intertwined.

References

Abruzzese, S. (2004, May 22). Inner-City seniors find the Golden Rule is a comforting fit. *The Washington Times*. Retrieved from https://secure.pqarchiver.com/washingtonpost/doc/409644703.html?FMT=FT&FMTS=ABS:FT&date=May+22%2C+2004&author=Abruzzese%2C+Sarah&desc=Inner-City+Seniors+Find+the+Golden+Rule+Is+a+Comforting+Fit

Abruzzese, S. (2004, October 16). Trinity Terrace fosters late-blooming friendships. *The Washington Times*. Retrieved from https://secure.pqarchiver.com/washingtonpost/doc/409781179.html?FMT=FT&FMTS=ABS:FT&date=Oct+16%2C+2004&author=Abruzzese%2C+Sarah&desc=Trinity+Terrace+Fosters+Late-Blooming+Friendships

Adams, C., Bartelt, D., Elesh, D., Goldstein, I., Freely, J., & Schmitt, M. (2008). *Restructuring the Philadelphia region: Metropolitan divisions and inequality*. Philadelphia: Temple University Press.

Argyris, C. (1998). Empowerment: The emperor's new clothes. *Harvard Business Review, 760*, 98-104.

Andrews, N. O. (1998). *Housing affordability and income mobility for the poor: A review of trends and strategies*. Washington, DC: U.S. Department of Housing and Urban Development.

Andrews, N. O. (1999). *Waiting in vain: An update on America's rental housing crisis*. Washington, DC: U.S. Department of Housing and Urban Development.

Babbie, E. R. (2009). *The practice of social research* (12th ed.). Farmington Hills, MI: Wadsworth.

Bay Area Economics. (2008). *Ward 8 comprehensive housing analysis, Washington, D.C*. Washington. D.C.: District of Columbia Office of Planning. Retrieved from http://dl.dropboxusercontent.com/u/95427853/Ward%208%20Housing%20Data%20Report2.pdf

Berg, B. L. (2004). *Qualitative research methods for the social services.* 5th ed. Boston: Pearson Education, Inc.

Bondas, T., & Hall, E. (2007). Challenges in approaching metasynthesis research, *Qualitative Health Research*, 17, 113-121.

Brathwaite, S. (2005, November 1). Franchises and community development corporations: Lessons learned. *Franchising World,* 50-53.

Bratt, R. G. (2006). Why CDCs should advocate for a right to housing. *Shelterforce Online*. Retrieved from nhi.org/online/issues/148/whycdcs.html

Brenneis, D. (1994). Discourse and discipline at the national research council: A bureaucratic *Bildungsroman*. *Cultural Anthropology, 9*(1), 23–36.

Bush, R. and Burns, A. (2006). Marketing Research, Fifth Edition, Upper Saddle River, NJ: Pearson Prentice Hall. City of Chicago, Department of Housing. (1998). *Housing opportunities into the next century: Affordable housing plan, 1999-2003*. Chicago, IL: Author.

Cambridge Community Development Department. (2011). *Inclusionary housing program for developers.* Retrieved from http://www.cambridgema.gov/cdd/housing/fordevelopersandpropmanagers/inclusionarydevelopers.aspx

Coalition for Nonprofit Housing and Economic Development (2008).

Corbin, J. M., & Strauss, A. L. (2008). *Basics of qualitative research: Techniques and procedures for developing grounded theory* (3rd ed.). Los Angeles, CA: Sage Publications.

Coser, Lewis A. (1977). *Masters of Sociological Thought: Ideas in Historical and Social Context*. 2d ed. New York: Harcourt Brace Jovanovich College Publishers.

Creswell, J. W. (2004) Educational Research: Planning, Conducting, and Evaluating Quantitative and Qualitative Research, Second Edition.

Creswell, J. W. (2009). *Research design: Qualitative, quantitative, and mixed methods approaches* (3rd ed.). Thousand Oaks, CA: Sage Publications.

Crittenden, W. F. (2000). Spinning straw into gold: The tenuous strategy, funding, and financial performance linkage. *Nonprofit and Voluntary Sector Quarterly, 29*(1), 164-182.

Cummings, J. L., & DiPasquale, D. (1998). *Building affordable rental housing: An analysis of the low income housing tax credit*. Boston, MA: City Research.

DeCrappeo, M., Pelletiere, D., Crowley, S., & Teater, E. (2010). *Out of Reach, 2010*. Washington, D.C.: National Low Income Housing Coalition.

DeBonis, M. (2007, November 29). Loose lips: Affordable housing not inclusive: What's happened to the cornerstone of Adrian Fenty's housing strategy? *Washington City Paper*, retrieved from http://www.washingtoncitypaper.com/articles/34171/affordable-housing-not-inclusive

Democracy Collaborative. (N. d.). Overview: Community Development Corporations (CDCs). Available from: http://community-wealth.org/strategies/panel/cdcs/index.html

District of Columbia, Department of Housing and Community Development. (2011). *FY 2010 annual action plan.* Retrieved from http://www.dhcd.dc.gov/dhcd/frames.asp?doc=/dhcd/lib/dhcd/services/brochures/finalfy2010actionplan8-14-092.pdf

Faux, G. (1971). *CDCs: New hope for the inner city. Report of the Twentieth Century Fund Task Force on Community Development Corporations*. New York, NY: The Twentieth Century Fund.

Freeman, L. (2006). *There goes the 'hood: Views of gentrification from the ground up*. Philadelphia: Temple University Press.

Galster, G., Levy, D., Sawyer, N., Temkin, K., & Walker, C. (2005, June). *The impact of Community Development Corporations on urban neighborhoods*. Washington, D.C.: Urban Land Institute.

Gee, J. P. (2011). *How to do discourse analysis: A toolkit*. New York: Routledge.

Gittel, R. & Wilder, M. (1999). Community Development Corporations: Critical factors that influence success. *Journal of Urban Affairs, 21*(3), 341-362.

Graziano A. & Raulin, M. (2010) *A Process of Inquiry* (7th Ed), Boston, MA: Allyn and Bacon.Lipsky, M. (1980). *Street-level bureaucracy: Dilemmas of the individual in public services.* Russell Sage Foundation.

Hodgson, D E., & Ball K S. (2001, July). Knowing your limits: Organisation studies and discourse analytic technologies. Presented at: Second International Conference on Critical Management Studies. Manchester, England.

Hogwood, B.W., & Gunn, L. (1984). *Policy Analysis for the Real World.* Oxford: Oxford Press University.

Huppe, P & Hill, M. (2007). Street-level bureaucracy and public accountability. *Public Administration, 85*(2), 279-99.

Joint Center for Housing Studies. (2008). *America's rental housing: The key to a balanced national policy.* Cambridge, MA: Harvard University. Retrieved from http://www.jchs.harvard.edu/sites/jchs.harvard.edu/files/rh08_americas_rental_housing.pdf

Kettle, D. (2000). The Transformation of Goverance: Globalization, Devolution, and the Role of Government. *Public Administration Review,* 60(6), 488-497.

Lipsky. M. (1980). *Street-level bureaucracy: The dilemmas of the individual in public service.* New York, N.Y.: Russell Sage Foundation.

Lundin, M. (2007). Explaining cooperation: How resource interdependence, goal congruence, and trust affect joint actions in policy implementation. *Journal of Public Administration Research and Theory, 17*(4), 651-672.

May, P. J. & Soren, C. (2009). 'Politicians, managers, and street-level bureaucrats: Influences on policy implementation. *Journal of Public Administration Research and Theory, 19*(3), 453.

McCarty, M. Perl, L., Foots, B. E., Jones, K., & Peterson, M. (2008). *Overview of federal housing assistance programs and policy* (Congressional Research Service Report). Washington, DC: Library of Congress.

Meyers, M., Riccucci, R., & Lurie, I. (2001). Achieving goal congruence in complex environments: The case of welfare reform. *Journal of Public Administration Research and Theory, 11*(2), 165-201.

Meyers, M. K., & Vorsanger, S. (2003). Street-level bureaucrats and the implementation of public policy. In B. Guy Peters & J. Pierre (Eds.), *Handbook of public administration* (245-55). Thousand Oaks, CA: Sage.

Moulton, L., & Anheier, K. (2000). Public-private partnerships in the United States: Historical patterns and current trends. In S. P. Osborne (Ed.), *Public-private partnerships: Theory and practice in international perspective* (pp. 105-199). New York, NY: Routledge.

National Alliance of Community Economic Development Associations. (2011). *Strategic plan 2011-2012.* Washington, DC: Author.

National Housing Trust Fund. (2011). *A home is the foundation.* Retrieved from www.nhtf.org/template/page.cfm?id=40#nhtfresources

National Low-Income Housing Coalition. (2011). *Out of reach 2011.* Retrieved from http://www.nlihc.org/oor/oor2011/oor2011pub.pdf

National Low Income Housing Coalition. (2014). Why donate? Retrieved from http://nlihc.org/donate/why

O'Donoghue, T., & Punch K. (2003). *Qualitative educational research in action: Doing and reflecting*. London and New York: RoutledgeFalmer.

Pettit, K. L. S., Hendey, L., Kingsley, G. T., Cunningham, M. K., Comey, J., Getsinger, L., Grosz, M. (2009). *Housing in the nation's capital, 2009*. Washington, D.C.: The Urban

Institute. Retrieved from http://www.urban.org/UploadedPDF/1001340_housingnationscapital09.pdf

Petter, J., Byrnes, P., Choi, D-L, Fegan, F., & Miller, R. (2002). Dimensions and patterns in employee empowerment: Assessing what matters to Street-Level Bureaucrats. *Journal of Public Administration Research and Theory, 12*(3), 377-392.

Pickman, J., Roberts, B. F., Leiterman, M., & Mittle, R. N. (1986). *Producing lower-income housing: local initiatives.* Washington, DC: The Bureau of National Affairs.

Ranshoff, D. F. (2005) "Bias as a threat to the validity of cancer molecular-marker researcher," Stanford.edu. Retrieved from: http://www.stanford.edu/class/cbio101/coursework/ransohoff2005.pdf

Rivers, E. (2007, September 15). Giving artists space to create: Groups public and private create affordable places to live, work. *The Washington Post*. Retrieved from https://secure.pqarchiver.com/washingtonpost/doc/410124718.html?FMT=FT&FMTS=ABS:FT&date=Sep+15%2C+2007&author=Eileen+Rivers+-+Washington+Post+Staff+Writer&desc=Giving+Artists+Space+to+Create%3B+Groups+Public+and+Private+Sponsor+Affordable+Places+to+Live%2C+Work

Sandelowski, M. & Barroso, J. (2007). *Handbook for synthesizing qualitative research*, New York: Springer.

Saunders, M., Lewis, P., & Thornhill, A. (2009). *Research Methods for Business Students*, New York: Pearson Education. Schill, M. H. (1996). Assessing the role of community development corporations in inner city economic development. *NYU Review of Law and Social Change*, 22(4), 753-781.

Smith, J. L. (2000). The space of local control in the devolution of US public housing policy. *Human Geography, 82*(4), 221-223.

Stoecker, R. (1996). *The community development corporation model of urban redevelopment: A political economy critique and an alternative.* Retrieved from http://comm-org.wisc.edu/papers96/cdc.html

Stone, Michael E. (2006). What is Housing Affordability? The Case for the Residual Income Approach. *Housing Policy Debate,* 17(1), 151-184.

Swanstron, T. & Koschinsky, (2000). J. Rethinking the partnership model of government-nonprofit relations: The case of community development. In. R. C. Hula & C. Jackson-Elmoore (Eds.), *Nonprofits in urban America* (86-91). Westport, CT: Praeger.

Trochim, W. & Donnelly, J. (2007). *The research methods knowledge base*, 3rd. ed., Thompson, New York.

Turner, M. A., Kingsley, G. T, Pettit, K. L. S., Cigna, J., & Fiseman, M. (2005). *Housing in the Nation's Capital, 2005*. Washington, D.C.: The Urban Institute. Retrieved from http://www.urban.org/UploadedPDF/1000853_HNC2005.pdf

Turner, M. A., Kingsley, G. T, Pettit, K. L. S., Comey, J., Woolley, M. Williams, B., & Cigna, J. (2006). *Housing in the Nation's Capital, 2006*. Washington, D.C.: The Urban Institute. Retrieved from http://www.urban.org/UploadedPDF/1001038_HNCannual2006.pdf

Turner, M. A., Kingsley G. T., Pettit, K. L. S., & Sawyer, N. (2004). *Housing in the Nation's Capital, 2004*. Washington, D. C.: Urban Institute. Retrieved from http://content.knowledgeplex.org/kp2/cache/documents/61617.pdf

U.S. Department of Housing and Urban Development. (2011). *Exploring the spatial distribution of low income housing tax credit properties.* Retrieved from http://www.huduser.org/portal/publications/pubasst/dawkins_exploring.html

U.S. Housing and Urban Development, Office of Planning and Development. (2013) HOME Investment and Partnership Programs. Retrieved from https://www.onecpd.info/home/

Vidal, A. C. (1995). Reintegrating disadvantaged communities into the fabric of urban life. *Housing Policy Debate, 6*(1), 169-230.

Walker, C. (1993). Nonprofit housing development: Status, trends, and prospects. *Housing Policy Debate, 4*(3), 369-414.

Walker, C. (2002). *Community development corporations and their changing support systems.* Washington, DC: The Urban Institute, Metropolitan Housing and Communities Policy Center.

Wardrip, K. E., Pelletiere, D. S., & Crowley, S. (2005). *Out of Reach, 2005*. Washington, D.C.: National Low Income Housing Coalition.

Wardrip, K. E., Pelletiere, D. S., & Crowley, S. (2006). *Out of Reach, 2006*. Washington, D.C.: National Low Income Housing Coalition.

Wardrip, K. E., Pelletiere, D. S., & Crowley, S. (2008). *Out of Reach, 2007-2008*. Washington, D.C.: National Low Income Housing Coalition.

Wardrip, K. E., Pelletiere, D. S., & Crowley, S. (2009). *Out of Reach, 2007-2008*. Washington, D.C.: National Low Income Housing Coalition.

Weber, Max (1946). *Bureaucracy.* Oxford Press.

Wylde, K. (1999). The contribution of public-private partnerships to New York's assisted housing industry. In M. H. Schill (Ed.), *Housing and community development in New York City* (pp. 73-91). New York, NY: State University of New York Press.

Yanow, D. (1996). *How Does a Policy Mean? Interpreting Policy and Organizational Actions.* Washington, DC: Georgetown University Press.

Yanow, D. (2000). *Conducting interpretive policy analysis.* Thousand Oaks, CA: Sage.

Yin, R.K. (2003). Case Study Research: Design and Methods. Thousand Oaks, CA: Sage Publications.

Appendix A

Institutional Review Board
University of Arkansas
Protocol Form

The University Institutional Review Board recommends policies and monitors their implementation, on the use of human beings as subjects for physical, mental, and social experimentation, in and out of class. . . . Protocols for the use of human subjects in research and in class experiments, whether funded internally or externally, must be approved by the (IRB) or in accordance with IRB policies and procedures prior to the implementation of the human subject protocol. . . Violation of procedures and approved protocols can result in the loss of funding from the sponsoring agency or the University of Arkansas and may be interpreted as scientific misconduct. *(see Faculty Handbook*)

Supply the information requested in items 1-14 as appropriate. **Type** entries in the spaces provided using additional pages as needed. In accordance with college/departmental policy, submit the original **and** one copy of this completed protocol form and all attached materials to the appropriate Human Subjects Committee. In the absence of an IRB-authorized Human Subjects Committee, submit the original of this completed protocol form and all attached materials to the IRB, Attn: Compliance Officer, ADMN 210, 575-2208. Completed form and additional materials may be emailed to [redacted]. The fully signed signature page may be scanned and submitted with the protocol, by FAX (575-3846) or via campus mail.

1. Title of Project: *Examining the Role of Street-level Bureaucrats in the Implementation of Affordable Rental Housing Policy for Extremely Low Income Households in the District of Columbia*

2. (Students **must** have a faculty member supervise the research. The faculty member must sign this form and all researchers and the faculty advisor should provide a campus phone number.)

Name Department Email Address Campus Phone

Principal Researcher Roderick Williams Public Policy UAF [redacted]

Faculty Advisor Valerie H. Hunt, Ph.D. Public Policy UAF [redacted]

3. Researcher(s) status. Check all that apply.

☐ Faculty ☐ Staff ☒ Graduate Student(s) ☐ Undergraduate Student(s)

4. Project type

☐ Faculty Research ☒ Thesis / Dissertation ☐ ClassProject ☐ Independent Study /
☐ Staff Research ☐ M.A.T. Research ☐ Honors Project/Educ. Spec. Project

5. Is the project receiving extramural funding? (Extramural funding is funding from an external research sponsor.)

☒ No ☐ Yes. Specify the source of funds

6. Brief description of the purpose of proposed research and all procedures involving people. Be specific. Use additional pages if needed. (**Do not** send thesis or dissertation proposals. Proposals for extramural funding must be submitted in full.)

Purpose of research: *This study of affordable rental housing programs seeks to shed light onto the problems that are often encountered by street-level bureaucrats during the implementation process. More specifically, the purpose of this study is to uncover the effects*

that street-level bureaucrats have on the implementation of affordable rental housing policies for ELI households within the CDC environment.

Procedures involving people: *Respondents of three CDCs located in the District's Ward 8 will be asked about their work with the LIHTC, HOME, and HPTF programs. The CDCs include Wheeler Creek Community Development Corporation (WCCD), Lydia's House, and the Congress Heights Community Training & Development Corporation (CHCTDC). Through face-to-face interviews, respondents will be asked to answer a total of nineteen questions during the interview, which will last no more than 90 minutes. Additionally, a follow-up questionnaire will be administered at the conclusion of data analysis. The anticipated completion of this questionnaire should last no longer than 10 minutes. The questionnaire will be developed from the interview data, thus it is not included here. A minimum of 3 individuals will be interviewed. In addition, a maximum of 5 individuals will be interviewed.*

7. Estimated **number of participants** (complete all that apply)

___ Children under 14 ____ Children 14-17 ____ UA students **3**__ Adult non-students (18yrs and older)

8. Anticipated dates for contact with participants:

First Contact: *December 15, 2012* Last Contact: *March 1, 2013*

9. Informed Consent procedures: The following information must be included in any procedure: identification of researcher, institutional affiliation and contact information; identification of Compliance Officer and contact information; purpose of the research, expected duration of the subject's participation; description of procedures; risks and/or benefits; how confidentiality will be ensured; that participation is voluntary and that refusal to participate will involve no penalty or loss of benefits to which the subject is otherwise entitled. See *Policies and Procedures Governing Research with Human Subjects*, section 5.0 Requirements for Consent.

☒ Signed informed consent will be obtained. **Attach copy of form**.

☐ Modified informed consent will be obtained. **Attach copy of form**.

☐ Other method (e.g., implied consent). **Please explain on attached sheet**.

☐ Not applicable to this project. **Please explain on attached sheet**.

10. Confidentiality of Data: All data collected that can be associated with a subject/respondent must remain confidential. Describe the methods to be used to ensure the confidentiality of data obtained.

All data collected will be held in strictest confidence. Data will be compiled and the project may be published, but individuals will not be identifiable. Surveys will be shredded after data analysis is complete. The audio-recorded interviews will utilize a coding method to match the responses with the individual interviewees. This will ensure the anonymity of each participant. The audiotapes will be erased after they have been transcribed.

11. Risks and/or Benefits:

Risks: Will participants in the research be exposed to more than minimal risk? F Yes X No Minimal risk is defined as risks of harm not greater, considering probability and magnitude, than those ordinarily encountered in daily life or during the performance of routine physical or psychological examinations or tests. Describe any such risks or discomforts associated with the study and precautions that will be taken to minimize them.

Benefits: Other than the contribution of new knowledge, describe the benefits of this research.

No other benefits

12. Check all of the following that apply to the proposed research. Supply the requested information below or on attached sheets:

☐ A. Deception of or withholding information from participants. Justify the use of deception or the withholding of information. Describe the debriefing procedure: how and when will the subject be informed of the deception and/or the information withheld?

☐ B. Medical clearance necessary prior to participation. Describe the procedures and note the safety precautions to be taken.

☐ C. Samples (blood, tissue, etc.) from participants. Describe the procedures and note the safety precautions to be taken.

☐ D. Administration of substances (foods, drugs, etc.) to participants. Describe the procedures and note the safety precautions to be taken.

☐ E. Physical exercise or conditioning for subjects. Describe the procedures and note the safety precautions to be taken.

☐ F. Research involving children. How will informed consent from parents or legally authorized representatives as well as from subjects be obtained?

☐ G. Research involving pregnant women or fetuses. How will informed consent be obtained from both parents of the fetus?

☐ H. Research involving participants in institutions (cognitive impairments, prisoners, etc.). Specify agencies or institutions involved. Attach letters of approval. Letters must be on letterhead with original signature; electronic transmission is acceptable.

☐ I. Research approved by an IRB at another institution. Specify agencies or institutions involved. Attach letters of approval. Letters must be on letterhead with original signature; electronic transmission is acceptable.

☐ J. Research that must be approved by another institution or agency. Specify agencies or institutions involved. Attach letters of approval. Letters must be on letterhead with original signature; electronic transmission is acceptable.

13. Checklist for Attachments

The following are attached:

☒ Consent form (if applicable) or

☐ Letter to participants, written instructions, and/or script of oral protocols indicating clearly the information in item #9.

☐ Letter(s) of approval from cooperating institution(s) and/or other IRB approvals (if applicable)

☒ Data collection instruments

14. Signatures

I/we agree to provide the proper surveillance of this project to insure that the rights and welfare of the human subjects/respondents are protected. I/we will report any adverse reactions to the committee. Additions to or changes in research procedures after the project has been approved will be submitted to the committee for review. I/we agree to request renewal of approval for any project when subject/respondent contact continues more than one year.

Principal Researcher
Date

Co-Researcher
Date

Co-Researcher
Date

Co-Researcher
Date

Faculty Advisor
Date

Appendix B

University of Arkansas
Informed Consent Form

This informed consent form is for affordable housing providers in the District's Ward 8 and who have been invited to participate in this research project.

Title of Project: Examining the Role of Street-level Bureaucrats in the Implementation of an Affordable Rental Housing Policy for Extremely Low Income Households in the District of Columbia.

Principle Investigator: Roderick T. Williams
Ph.D. Candidate, Public Policy Ph.D. Program
University of Arkansas
Fayetteville, AR. 72701
E-mail: [redacted]

DESCRIPTION: You are invited to participate in a research study on the implementation of affordable rental housing programs in Ward 8. Affordable rental housing is becoming increasingly difficult to find for extremely low-income households in the District. It is also having a huge impact on those same households in your community – Ward 8. The purpose of this study is to uncover the effects that street-level bureaucrats have on the implementation of affordable rental housing policies for ELI households within the CDC environment. Through face-to-face interviews, respondents will be asked to answer a total of nineteen questions during the interview, which will last no more than 60 minutes. Your interview will be audiotaped. The audiotapes will be destroyed after transcription.

Please indicate below if you are willing to have this interview recorded on audiotape. You may still participate in this study if you are not willing to have the interview recorded.

Additionally, a follow-up questionnaire will be administered. The anticipated completion of this questionnaire should last no longer than 15 minutes.

TIME INVOLVEMENT: Your total participation will take approximately 75 minutes.

RISKS AND BENEFITS: The risks associated with this study are minimal, if any. There will be no direct benefit to you, but your participation is likely to help us find out more about how to address the affordable rental housing dilemma facing extremely low-income households.

PARTICIPANT'S RIGHTS: If you have read this form and have decided to participate in this project, please understand your participation is voluntary and you have the right to withdraw your consent or discontinue participation at any time. You have the right to refuse to answer particular questions. The results of this research study may be presented at scientific or professional meetings or published in scientific journals. No personal information will be

included in any presentation or publication resulting from this research. Any information about you will have a number on it instead of your name. All information collected will be kept confidential to the extent allowed by law and University policy.

CONTACT INFORMATION:

Questions: If you have questions or concerns about this study, you may contact the Faculty Advisor, Dr. Valerie Hunt, at [redacted] or by e-mail at [redacted]. For questions or concerns about your rights as a research participant, please contact Ro Windwalker, the University's Compliance Coordinator, at [redacted] or by e-mail at [redacted].

I give consent to be audiotaped during this study.

Please initial: ___Yes ___No

The extra copy of this consent form is for you to keep.

SIGNATURE _____ DATE _____

Appendix C

Interview Topic Guide

Introduction

Title of Project: Examining the Role of Street-level Bureaucrats in the Implementation of an Affordable Rental Housing Policy for Extremely Low Income Households in the District of Columbia.

Hello (respondent name), my name is Rod Williams. Thank you for your willingness to participate in this study. This study will seek to uncover the effects that street-level bureaucrats have on the implementation of affordable rental housing policies for ELI households within the CDC environment. The research will focus specifically on Ward 8 in the District.

Background Information on Interviewee

Date:

Name:

What is your title/position and how long have you worked in this office?

What are the primary functions of your job?

The first set of questions is general questions relating to your organization's role in providing affordable housing to this community.

1. What programs are used by your organization to provide affordable housing to this community?

2. Do you utilize targeted strategies for specific populations: low- income, extremely low-income, etc.?

3. How would you characterize your organization's support of affordable rental housing activities?

4. From your perspective, what are the challenges your institution faces in terms of improving the housing situation for ELI renter households?

5. Are there additional resources needed to implement these programs?

The next set of questions is about your work environment.

1. What would you describe as the major challenges you face in attempting to provide affordable rental housing to your clients?

2. What factors enhance or impede the successful implementation of affordable rental housing programs?

3. What other internal/external forces shape/have shaped the way you deliver housing to your clients?

The following questions are about the views that you hold in regard to the way affordable housing programs are structured.

1. To what extent are LIHTC, HPTF, and HOME being implemented by your organization?

2. How do you characterize the workings of the LIHTC, HPTF, and HOME?

3. What are the benefits and advantages of each program as a standard for the development/preservation of affordable rental housing for ELI households?

4. What are the limitations, liabilities, and disadvantages of each program as a standard for the provision of affordable rental housing for ELI households?

The final set of questions focuses on philosophy and work ethic.

1. What is your role in achieving the organization's housing mission?

2. What motivates you to improve access to affordable rental housing for ELI households?

3. Are there any particular characteristics that you associate with colleagues that are also interested in innovative affordable housing initiatives?

4. How do you balance the needs of your clients with your organization's ability to provide such housing?

5. How do you feel your decisions are limited?

6. Have you ever made a decision that was changed by someone of higher authority?

7. Does a fear of discipline affect the decisions you make in your current role?

Wrap-up.

Mr. or Ms. (respondent's name) thanks for your time, participation, and insight.

Appendix D

IRB Approval Letter

December 19, 2012

MEMORANDUM

TO: Roderick Williams
Valerie Hunt

FROM: Ro Windwalker
IRB Coordinator

RE: New Protocol Approval

IRB Protocol #: 12-12-319

Protocol Title: **Examining the Role of Street-Level Bureaucrats in the Implementation of Affordable Rental Housing Policy for Extremely Low Income Households in the District of Columbia**

Review Type: 1 EXEMPT 0 EXPEDITED 0 FULL IRB

Approved Project Period: Start Date: 12/19/2012 Expiration Date: 12/18/2013

Your protocol has been approved by the IRB for Phase I – Interviews only. Follow-up questionnaires must be submitted for approval as a modification before implementation. Protocols are approved for a maximum period of one year. If you wish to continue the project past the approved project period (see above), you must submit a request, using the form Continuing Review for IRB Approved Projects, prior to the expiration date. This form is available from the IRB Coordinator or on the Research Compliance website (http://vpred.uark.edu/210.php). As a courtesy, you will be sent a reminder two months in advance of that date. However, failure to receive a reminder does not negate your obligation to make the request in sufficient time for review and approval. Federal regulations prohibit retroactive approval of continuation. Failure to receive approval to continue the project prior to the expiration date will result in Termination of the protocol approval. The IRB Coordinator can give you guidance on submission times.
This protocol has been approved for 5 participants. If you wish to make any modifications in the approved protocol, including enrolling more than this number, you must seek approval prior to implementing those changes. All modifications should be requested in writing (email is acceptable) and must provide sufficient detail to assess the impact of the change.
If you have questions or need any assistance from the IRB, please contact me at [redacted].

Appendix E

Respondent Follow-up Survey

Q1 There is serious concern about the lack of available rental housing for extremely low-income households in the community in which my organization resides.

	Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree	Total	Average Rating
(no label)	0% 0	0% 0	0% 0	33.33% 1	66.67% 2	3	4.67

Q2 There are concerns about the rising cost of affordable rental housing for my constituents.

	Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree	Total	Average Rating
(no label)	0% 0	0% 0	0% 0	0% 0	100% 3	3	1.00

Q3 There is a lack of support for affordable rental housing programs from citizens and policymakers.

	Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree	Total	Average Rating
(no label)	0% 0	33.33% 1	0% 0	66.67% 2	0% 0	3	3.00

Q4 There should be more sharing of valuable knowledge among community organizations involved in the preservation and production of affordable rental housing.

	Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree	Total	Average Rating
(no label)	0% 0	0% 0	0% 0	33.33% 1	66.67% 2	3	1.00

Q5 There are concerns about organization goals not being aligned with those of the community.

	Strongly Disagree	Disagree	Neutral	Agree	Stongly Agree	Total	Average Rating
(no label)	0% 0	33.33% 1	0% 0	66.67% 2	0% 0	3	1.00

Q6 The Low-Income Tax Credits, HOME program, and the Housing Production Trust Fund are difficult for my organization to use to provide affordable rental housing for my constituents.

	Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree	Total	Average Rating
(no label)	0% 0	33.33% 1	33.33% 1	0% 0	33.33% 1	3	1.00

Q7 The Low Income Housing Tax Credit, HOME, and the Housing Production Trust Fund programs are useful and beneficial to organizations that have the capacity to implement them.

	Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree	Total	Average Rating
(no label)	0% 0	0% 0	0% 0	66.67% 2	33.33% 1	3	1.00

Q8 There is a perception fraudulent activities regularly occur in the implementation of affordable housing programs.

	Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree	Total	Average Rating
(no label)	0% 0	33.33% 1	0% 0	66.67% 2	0% 0	3	1.00

Q9 There is a perception that the availability of program funding fluctuates and is inconsistent.

	Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree	Total	Average Rating
(no label)	0% 0	0% 0	0% 0	100% 3	0% 0	3	1.00

Q10 A desire to help constituents locate affordable housing is a common value among street-level bureaucrats who work at CDCs.

	Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree	Total	Average Rating
(no label)	0% 0	33.33% 1	0% 0	0% 0	66.67% 2	3	1.00

Q11 CDC employees must be driven by a desire to help the community they serve.

	Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree	Total	Average Rating
(no label)	0% 0	0% 0	0% 0	0% 0	100% 3	3	1.00

Q12 Expressing concern for constituents is a necessary quality for an employee of a CDC.

	Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree	Total	Average Rating
(no label)	0% 0	0% 0	0% 0	0% 0	100% 3	3	1.00

Q13 CDC employees work to ensure the community reflects economic diversity.

	Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree	Total	Average Rating
(no label)	0% 0	0% 0	33.33% 1	33.33% 1	33.33% 1	3	1.00

Q14 My authority and decision making is limited by the availability of financing/funding for affordable rental housing.

	Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree	Total	Average Rating
(no label)	33.33% 1	0% 0	0% 0	66.67% 2	0% 0	3	1.00