American Sociological Review
1–28

DOI:10.1177/00031224221131798
journals.sagepub.com/home/asr

Ready to Rent: Administrative Decisions and Poverty Governance in the Housing Choice Voucher Program

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Abstract

Sociological studies of poverty governance investigate how state actors manage marginalized populations, regulate their participation in social institutions, and reform their behavior through systems of punishment and rewards. Research in this area considers a range of institutions involved in managing poverty, but it has largely ignored an institution omnipresent in the lives of the poor—public housing agencies (PHAs). Focusing on the Housing Choice Voucher program, the largest rental assistance program in the country, I examine discretionary choices made by PHAs that affect who gets access to rental assistance, how long clients have to wait, and what they must do to maintain their benefits. I ask how these administrative decisions create successive opportunities for state agencies to govern the poor. Drawing on interviews with agency officials, I describe a tripartite process of selecting market-ready households, engaging them in rituals of market formation, and utilizing market nudges to remind them of their responsibilities as market actors. This framework deepens sociological understandings of how local state agencies utilize discretionary choices in a resource-scarce, highly decentralized policy environment to evaluate, reform, and discipline the poor.

Keywords

housing, poverty governance, welfare state, rental assistance, neoliberalism

Sociological studies of poverty governance investigate how state actors manage marginalized populations, regulate their participation in social institutions, and reform their behavior through systems of punishment and rewards (Piven and Cloward 1971; Soss, Fording, and Schram 2011; Wacquant 2009). These practices categorize the poor and manage their non-compliance with social norms and expectations. Research on poverty governance considers a range of institutions involved in managing poverty, including the criminal legal system (Brydolf-Horwitz and Beckett 2021; Halushka 2020), child protective services (Fong 2020), and medical professionals (Lara-Millán 2021; Seim 2017, 2020), but it has largely ignored an institution omnipresent in the lives of the poor—public housing agencies (PHAs).

In their search for decent, affordable housing, poor households regularly turn to local PHAs to gain access to federal rental assistance programs, like the Housing Choice Voucher program. These agencies manage waitlists,

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certify program eligibility, and assist low-income households in their housing search on the private market. As they administer these federal programs, PHAs make discretionary choices that affect who gets access to rental assistance, how long they have to wait, and what they must do to maintain their benefits (McCabe and Moore 2021; Moore 2016). In this article, I ask how these administrative decisions create successive opportunities for state agencies to govern the poor. I show that simple programmatic decisions, like when to open a waitlist or how to assist in a housing search, enable street-level bureaucrats to monitor poor households, suggest behavioral reforms, and punish those unable to abide by the standards imposed by the rental market. These practices generate new categories of deservingness for public assistance—categories that largely center on PHA evaluations of market readiness, performance, and success. With millions of poor households in need of affordable housing, the actions of housing agencies govern not only those fortunate enough to gain access to rental assistance—about one in five income-eligible households (Kingsley 2017)—but the countless families left lingering on waitlists or denied access to housing benefits all together.

Given the persistence of housing insecurity in the lives of poor households (DeLuca and Rosen 2022), federal assistance programs are an important place to understand poverty governance. Without a robust safety net to assist households experiencing residential instability, the poor often rely on rental assistance programs, like the Housing Choice Voucher program, that require them to independently navigate the private market. But for many of these households, the experience of the rental market is shaped by structural barriers that impede their housing search (DeLuca, Garboden, and Rosenblatt 2013; Ellen 2020). Clients often enter the market with poor credit scores, eviction records, and limited experience with the housing search process (Rosen 2020). Persistent racial discrimination in housing markets (Howell and Korver-Glenn 2018, 2021; Korver-Glenn 2018; Pager and Shepherd 2008; Yinger 1997) and limited legal protections for assisted renters (Freeman 2012; Freeman and Li 2014; Tighe, Hatch, and Mead 2017) hinder their search for affordable housing. Given these challenges, about three in ten households awarded a voucher through the Housing Choice Voucher program are unable to secure housing on the private market before their subsidy expires (Finkel and Buron 2001).[1]

To administer the voucher program, PHAs maintain waitlists for rental assistance, select households from those lists, and ready them to navigate the rental market. Through their everyday administrative decisions, these agencies play an active role in managing the housing experiences of low-income renters. To understand how PHAs govern poverty through these decisions, I describe a tripartite process of *selecting* market-ready households, engaging them in rituals of *market formation*, and utilizing *market nudges* to remind them of their responsibilities as market actors (Power and Gillon 2022). From the moment clients join the waitlist through the time they sign a lease, PHAs assess the suitability of prospective clients for the rental market, suggest behavioral modifications for those selected into the program, and discipline the non-compliance of those who fail to abide by market norms. Although most of the administrative tasks used to evaluate market readiness or improve market performance are *not* designed exclusively for that purpose, they nevertheless provide agency officials with evidence about the market-worthiness of low-income renters. These tasks enable street-level bureaucrats to categorize low-income renters and generate categories of deservingness for rental assistance. By analyzing the practices used by PHAs to govern residentially insecure households, this article contributes to a burgeoning body of sociological scholarship that considers *how* and *why* the state manages marginality.

All types of local state agencies make discretionary choices as they administer federal social programs, but PHAs offer a particularly poignant field site for understanding the relationship between discretionary decision-making, the private market, and the governance of poverty. These city- and county-level agencies exercise broad discretionary authority over a highly-decentralized federal program. Without enough vouchers to serve every income-eligible client, PHAs operate in an environment of resource scarcity that requires street-level bureaucrats to decide who gets access to rental assistance, and who gets left behind. Resource scarcity enables PHAs to link the receipt of rental assistance to the perceived viability of individuals as market actors, thereby conditioning government assistance on the successful performance of market readiness. PHAs discipline non-conformity by withholding rental assistance or taking vouchers back from those deemed unsuccessful. But PHAs are not the only agencies that operate under the constraints of resource scarcity. School districts select children through lotteries to attend high-performing schools, as the demand for these seats outstrips their supply (Glazerman and Dotter 2017). Community organizations provide workforce training to a fraction of eligible households because they are hamstrung by limited funding. Permanent supportive housing through Housing First programs assist only a slice of the unhoused population (Hennigan 2017), and programs that provide access to legal counsel help only a fraction of tenants experiencing eviction (Ellen et al. 2021; Seron et al. 2001). Beyond the Housing Choice Voucher program, my analysis introduces a broader framework to understand how local state agencies utilize discretionary choices in a resource-scarce, highly decentralized policy environment to evaluate, reform, and discipline the poor.

To lay the groundwork for my analysis of poverty governance, I begin by describing the Housing Choice Voucher program and the intermediary role played by PHAs on the rental market. Focusing on the importance of policy decentralization and performance management to the project of neoliberalism, I explain how rental assistance programs exemplify the neoliberal turn in social policy. Next, I engage theories of poverty governance to sketch a theoretical apparatus for understanding how (and why) PHAs manage the poor. My approach considers how state agencies evaluate the market readiness of the poor, incentivize behavioral change, manage the experience of those awaiting assistance, and create categories of deservingness. I describe how PHAs select market-ready households, engage in practices of market formation, and rely on market nudges to ensure client success on the rental market. This tripartite framework is broadly applicable to other state agencies involved in selecting program participants and managing their market participation. After showing *how* PHAs govern poverty through the voucher program, I consider reasons *why* street-level bureaucrats engage in this resource-intensive process. These practices reduce the burdens placed on agency officials (and subsequently increase those placed on clients), but they also reflect the decentralized politics of neoliberalism, including the reliance on performance metrics to evaluate agency performance.

RENTAL ASSISTANCE THROUGH THE HOUSING CHOICE VOUCHER PROGRAM

As the largest rental assistance program in the nation, the Housing Choice Voucher program assists more than 2.3 million households in finding affordable housing on the private market (Ellen 2020; Schwartz 2014). Among assisted households, 48 percent identify as African American and 18 percent identify as Hispanic (U. S. Department of Housing and Urban Development n.d.). The U.S. Department of Housing and Urban Development (HUD) provides federal funds to nearly 2,200 PHAs to administer the program.[2] As gatekeepers of the Housing Choice Voucher program, these agencies maintain waitlists and select clients to participate. But unlike other programs of the welfare state, including food stamps or Medicaid, housing assistance is *not* administered as an entitlement program

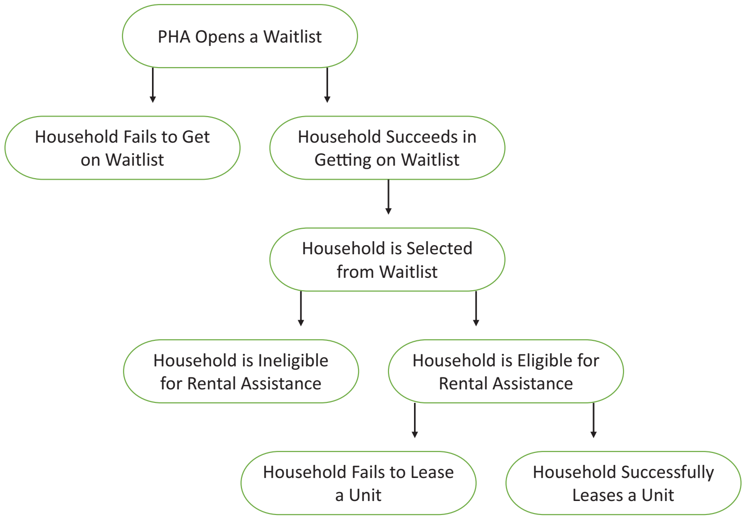

Figure 1. Waitlist and Selection Process into the Housing Choice Voucher Program

to eligible households. In fact, only about one in every five income-eligible households receives any form of government rental assistance (Kingsley 2017): millions more apply to join waitlists and never receive a voucher. As such, the practices of poverty governance described in this article, including the efforts to manage marginalized households and categorize them by their level of deservingness, touch millions of unassisted households seeking affordable housing, not only the fraction of households who ultimately gain access to an affordable housing unit.

Public housing agencies rely on a system of waitlists and lotteries to ration vouchers and select households for the program (Moore 2016). This rationing system requires low-income households to navigate a series of steps to gain access to rental assistance (see Figure 1). First, PHAs generate waitlists of households interested in the program. Once on the waitlist, applicants often linger for years before being selected to receive a voucher (Mazzara 2017; National Low Income Housing Coalition n.d.). After they are chosen from a waitlist, selected applicants complete a criminal background check, provide proof of citizenship status, and document their income to certify eligibility for the program. They also verify their eligibility for any special preferences under which they were selected.[3] Certified clients then attend briefing sessions held by the housing agency that explain program rules and regulations. Only upon successful completion of the voucher briefing are clients issued a voucher to search for housing on the rental market. Clients are guaranteed a minimum of 60 days to search for an apartment, although many housing agencies offer extensions to clients unable to secure a unit during their initial search period.

Once they begin their housing search, participants in the Housing Choice Voucher program are subject to the same expectations as unassisted renters on the private market. They undergo screening processes by private landlords and enter into rental agreements directly with them.[4] Assisted clients pay rent equivalent to 30 percent of their income directly to the landlord, and the housing voucher, paid by the PHA, covers the remaining portion of the rent. Like other market renters, voucher clients risk eviction if they fail to abide by the terms of their lease.

Notably, each step of this process requires the cooperation of private landlords to fulfill the welfare goals of the state (Rosen and Garboden 2022). The state provides a rental supplement to increase the purchasing power of low-income households, and private landlords provide the housing units on the rental market. This reliance on the private market is designed to increase opportunities for low-income renters to secure high-quality housing across a range of neighborhoods, but it creates significant challenges. First, clients regularly encounter private landlords unwilling to rent to households with a voucher (Cunningham et al. 2018; Garboden et al. 2018; Greif 2018; Phillips 2017). Only a handful of jurisdictions offer source of income protections to combat discrimination, and these protections are difficult to enforce (Freeman 2012; Freeman and Li 2014; Tighe et al. 2017). Second, the high cost of housing—especially in tight rental markets—remains an impediment to utilizing a voucher. With limited time to search for housing, many clients end up living in high-poverty neighborhoods, rather than gaining access to neighborhoods of opportunity (DeLuca et al. 2013; Ellen 2020; Galvez 2010; McClure 2008; McClure, Schwartz, and Taghavi 2015; Rosen 2014). Finally, many clients enter the program with poor credit scores, eviction records, and unstable housing histories that exacerbate the challenges of renting in the private market. Together, these factors create significant impediments in the search for affordable housing.

NEOLIBERALISM AND THE POLITICS OF HOUSING ASSISTANCE

Rental assistance programs, like the Housing Choice Voucher program, exemplify the contemporary logics of neoliberalism. The neoliberal turn in social policy privileges the role of the private market in organizing social relations. To do so, it requires the participation of state actors to create the conditions under which market fundamentalism flourishes. Analyses of neoliberalism emphasize both the deregulation of private industry and the primacy of individual choice necessary to enable market logics to guide economic and social life (Feldman 2019; Hacker 2002; Hackworth 2007; Peck 2010). But a sociological understanding of neoliberalism demands an analysis of the social relations between actors, including poor households and the state, that guide market participation. Wacquant (2010:200) argues for a "thick sociological specification" that simultaneously considers how state actors assert control over the workforce, expand the disciplinary functions of the penal state, and reinforce tropes of individualism to strengthen market-centered ideologies. Applying these ideas to the rental market, a "thick sociological specification" focuses on the tools state actors use to manage assisted renters, discipline them through resource scarcity, and emphasize individual agency in their housing search.

The project of neoliberalism relies on a scalar logic that decentralizes responsibility for social policy from national authorities to local, substate actors, like PHAs. Describing the movement from welfare to workfare, Peck (2002) emphasizes the responsibility of these subnational actors to design and implement workfare programs. In the criminal justice system, Miller (2014) shows how responsibility for managing and supervising criminal offenders has been descaled to local agencies from higher-order governments. Applied to the domain of low-income housing policy, this decentralization amplifies the responsibility of city- and county-level housing agencies to implement rental assistance programs in accordance with federal guidelines. Notably, this policy devolution comes alongside the hollowing out of the state in the delivery of social policy (Milward and Provan 2000, 2003). Increasingly, local state agencies rely on nonstate partners, including for-profit and nonprofit agencies, to provide welfare assistance. They focus on a range of market mechanisms, including wholesale contracts with nongovernmental agencies for service provision and the distribution of vouchers for clients to secure services on the private market (Hacker 2002: Table 1.1). In the Housing Choice Voucher program, private landlords serve as market partners in the provision of affordable housing (Rosen and Garboden 2022).

Policy devolution has generated new modes of oversight for federal agencies to monitor and evaluate local agency performance. This performance oversight enables federal authorities to both reward high-performing agencies and withhold resources (or demand policy changes) from those deemed underperforming. In the voucher program, HUD evaluates PHA performance through the Section Eight Management Assessment Program (SEMAP). SEMAP relies on 14 quantitative metrics, including whether agencies properly select households from the waitlist, accurately verify household income, and utilize all the vouchers allocated to the agency (Greenlee, Lee, and McNamara 2018).[5] PHAs can only optimize this final metric—the voucher utilization rate—when clients successfully rent a housing unit with their vouchers on the private market. Because HUD redirects resources away from underperforming PHAs, poor performance on the SEMAP indicators results in a subsequent decline in program funding (and therefore, a reduced capacity to serve eligible households in the future). Although these types of agency performance metrics are a common tool of neoliberal social policy, their usage by local agencies—and the consequences for the practices of poverty governance—remains undertheorized.[6]

The growing importance of performance metrics raises the stakes for state agencies to manage the performance of their clients. Because measures of *agency* performance rely on the performance of *clients* themselves, state agencies must actively work to ensure their clients are prepared to succeed on the private rental market. With few tools to change conditions in the low-income housing market, housing agencies instead work to prepare clients to meet the demands of the rental market and withhold resources from those deemed unlikely to succeed. As part of the broader project of neoliberalism, state agencies emphasize personal responsibility in the search for affordable housing—an emphasis that shifts responsibility for market success onto individual clients (and away from state agencies) and provides cover for the retrenchment of state responsibility for creating universal social obligations on behalf of the poor (Wacquant 2009, 2010). There is perhaps no realm of social policy where this aspect of neoliberalism—the powerful trope of individual responsibility—has been more transformative than in the field of affordable housing policy. Clients selected for the Housing Choice Voucher program search for housing on their own, albeit under rules imposed by PHAs and constraints imposed by the market, and they bear responsibility for their own success (and failures) in finding housing. By conditioning the receipt of rental assistance on the individual capacity to find market-based housing, the program exemplifies this animating logic of neoliberalism.[7]

Guided by these three principles—the devolution of responsibility to subnational actors, the federal oversight of local agency performance through a system of quantitative metrics, and the emphasis on personal responsibility to improve client performance—the role of state organizations to deliver social services has changed (Lipsky 1980; Watkins-Hayes 2009; Zacka 2017). These changes have been particularly stark in public housing agencies. Historically, PHAs were responsible for the physical management of buildings and public housing developments. But as this infrastructure fell into disrepair, the model of rental assistance changed from a place-based approach to a tenant-based one (Vale and Freemark 2012). This policy shift led to dramatic changes in the responsibilities of implementing agencies. In tenant-based programs, like the Housing Choice Voucher program, the logics of neoliberalism require the management of individual tenants as they search for housing on the rental market, rather than the management of housing units and buildings.

POVERTY GOVERNANCE AND THE RENTAL MARKET

Local state agencies operating in an environment of resource scarcity and policy decentralization engage in practices to manage, reform, and punish poor households. Chief among them, these agencies rely on behavioral modifications to reform the behavior of the poor and realign their social values (Katz 2008; Mead 1997; Piven and Cloward 1971; Schram et al. 2010). Soss and colleagues (2011) identify how state actors emphasize behavioral modifications to promote specific moral orientations and create self-governing citizens capable of adhering to the demands of the private market. In social policy, this approach often links the provision of government programs to mandated behavioral changes or reforms. Recipients may be required to work a certain number of hours each week, attend an education program, or participate in a job-training program as a condition of assistance. But even when public assistance is *not* directly contingent on work requirements, it can be used as a tool to govern poor households and nudge them to conform with specific behavioral expectations. Describing behavioral modifications through ex-felon reentry programs, Miller (2014) highlights efforts to reform ex-offenders, build personal attributes, and improve skills to enable their participation in the workforce. When the state conditions the receipt of assistance on the performance of particular behaviors—and punishes non-compliance with these norms—social policy is used as a tool of social control, rather than simply a tool to maintain a basic level of economic sustenance (Bruch, Ferree, and Soss 2010).

Behavioral modifications are not the only tool of poverty governance. State agencies regularly monitor and surveil poor households as they seek to manage the experience of poverty. Scholars writing about the criminal legal system frequently analyze surveillance tactics, and these tools of governance are common to other social policy arenas, too. Writing about invasive surveillance techniques through child protective services (CPS), Fong (2020:614) positions the surveillance of private homes as blurring the lines between "care and control." As an example of the therapeutic hand of the state operating alongside its carceral hand (Stuart 2014; Wacquant 2009), this combination of therapeutic assistance with coercive authority enables state officials to govern and surveil families under their watch. Surveillance and monitoring occur elsewhere inside the homes of the poor, too (Gurusami and Kurwa 2021). Kirk (2021) points to electronic home monitoring as a form of constant surveillance without the direct oversight of penal institutions, and Hughes (2021) notes the marginalizing effect of surveillance in subsidized housing, especially for mothers.

Whereas these surveillance techniques curtail personal freedoms through state-sanctioned monitoring, other tactics of poverty governance extract material penalties and create financial obligations to the state. In the criminal legal system, the state relies on its coercive power to extract financial resources (Katzenstein and Waller 2015) and generate relationships of indebtedness (Pattillo and Kirk 2021). Identifying debt and credit as a form of social control, Pattillo and Kirk (2021) point to practices of "layaway freedom" that condition the freedom of criminal defendants on their payment of fines and debts. This form of poverty governance utilizes financial penalties to control the poor and restrict their participation in society.

Ultimately, these systems of surveillance, behavioral modifications, and indebtedness enable street-level bureaucrats to sort and classify the poor. Through these sorting processes, state agencies distinguish between those who meet their imposed obligations (e.g., paying their financial penalties, modifying their behavior) and those who fail to do so. These classification schemes serve important social functions by reifying categories of deservingness, marginalizing those deemed ungovernable, and justifying the removal of non-conforming populations from public spaces. These functions are particularly visible in the management of unhoused populations. Aggressive policing of the homeless and their criminalization leads to the spatial rearrangement of social marginality (Sparks 2012), their sorting into therapeutic institutions (Stuart 2014), or their removal from public spaces (Herring 2019, 2021). In many cities, homeless populations are subject to increased management and regulation as a consequence of their unhoused status (DeVerteuil 2003; DeVerteuil, May, and von Mahs 2009). As tools of poverty governance, these processes of categorizing and sorting result in the confinement of marginalized populations into totalizing institutions, including prisons (Wacquant 2009, 2010) and rehabilitation centers (Gong 2019; Gowan and Whetstone 2012), that facilitate the management of their non-compliance. Within social service agencies, these processes of classification enable street-level bureaucrats to mandate behavioral reforms as a precondition of public assistance or deny benefits to those categorized as unworthy.

The management of poverty often occurs through the criminal legal system, yet a broader body of scholarship acknowledges a range of state institutions where the poor are managed, governed, and surveilled. From the fragmented management of the medically vulnerable (Seim 2017) to the civic evaluation of misdemeanor defendants (Kohler-Hausmann 2013), the poor are governed in welfare agencies, hospitals, courtrooms, and homeless shelters. When this scholarship touches on the role of housing, it often does so through the lens of the criminal legal system or by identifying housing as a tool of behavioral management. Hamlin and Purser (2021) identify how housing programs for ex-offenders reproduce the stigma of criminality and reinforce patterns of state supervision. Hennigan (2017) documents the paternalism of reintegrative Housing First programs by describing how they reinforce normative assumptions about who clients are or should be, and how they should behave (see also Hasenfeld 2000). Importantly, as more state agencies have become involved in these processes, the experience of poverty governance has become increasingly onerous for poor households. Especially for households exiting the criminal legal system, the experience of constant surveillance, mandated behavioral change, and the ongoing threats of punishment from state agencies creates an endless runaround (Halushka 2020).

As sociological analyses deepen our focus on poverty governance, this research must strive to understand not only *where* and *why* the state governs poverty, but also *how* it does so. Evaluating how state agencies construct rules, organize programs, and evaluate compliance shifts sociological analyses from abstract principles of governance to the on-the-ground practices of doing so. State agencies regularly create administrative burdens that generate opportunities to evaluate the competencies of poor households seeking access to social programs (Herd and Moynihan 2019). Modes of procedural hassles enable state agencies to assess the governability of citizens as they interact with local institutions (Kohler-Hausmann 2013; Nelson 2021). Because these tactics are not always designed to govern poverty per se, their role in managing the poor is often obscured in the routine process of implementing social policy. Turning to the everyday choices required to administer the Housing Choice Voucher program, I consider how these programmatic decisions generate successive opportunities to evaluate, manage, and discipline poor households seeking rental assistance.

DATA AND ANALYSIS

To understand the administrative practices in the Housing Choice Voucher program, I conducted interviews with officials at 53 housing agencies. Most interview participants served as the director (or associate director) of the Housing Choice Voucher program at participating agencies, although interviews were also conducted with housing specialists, policy directors, and other staff members with direct knowledge of the voucher program.[8] I selected the sample of housing agencies to reflect variation in the size, geography, and housing markets experienced by agencies administering the Housing Choice Voucher program. Large housing agencies (e.g., those that administer between 1,250 and 10,000 vouchers) comprise about half the sample. These agencies make up only about 16 percent of all agencies in the Housing Choice

Table 1. Descriptive Statistics of Sample Agencies

	Sample PHAs	All PHAs with HCV Programs
Size: Small or Very Small (< 250 vouchers)	13.73%	46.63%
Size: Low-Medium (250 to 500 vouchers)	3.92%	17.06%
Size: High-Medium (500 to 1,250 vouchers)	17.65%	19.07%
Size: Large (1,250 to 10,000 vouchers)	49.02%	15.64%
Size: Very Large (> 10,000 vouchers)	15.69%	1.60%
Location: Midwest	13.73%	26.30%
Location: Northeast	17.65%	25.68%
Location: South	27.45%	35.79%
Location: West	41.18%	12.23%

Voucher program, yet they are responsible for overseeing nearly 75 percent of vouchers nationwide. Less than 18 percent of agencies in the sample administer fewer than 500 units. These small- and medium-sized agencies comprise 64 percent of public housing agencies in the program, but they administer only 12 percent of total vouchers.[9] Geographically, 27 percent of agencies were in the South, 18 percent were in the North, and 41 percent were from the West. Eight housing agencies in the sample currently participate in HUD's Moving to Work (MTW) demonstration (Walter et al. 2020).

Table 1 shows the descriptive characteristics of sample agencies compared to the full universe of housing agencies. The sample is disproportionately composed of large housing agencies located in major metropolitan areas, but the goal of this analysis is *not* to make generalizable claims based on a representative sample of housing agencies. Instead, by purposively drawing a sample of agencies with diverse characteristics operating across different types of housing markets, the analysis aims to identify patterns as PHAs select and ready households to enter the private rental market.

I initially conducted eight pilot interviews between January and December 2017. After refining the interview script, I then conducted interviews with officials at 53 housing agencies between March 2018 and October 2019.[10] During this period, I collected 3,355 minutes of recorded interviews. The average interview lasted 65 minutes. Most interviews were conducted on-site at the housing agency; about one-fifth of the interviews were conducted over the phone. The semi-structured interviews loosely followed a script to engage practitioners in key aspects of their program administration, including waitlist management practices, selection procedures, intake processes, voucher briefings, and the housing search. Interviewees were prompted to describe key aspects of their program, including rules around portability or the determination of preference structures, when these topics did not naturally arise during the interview. Interviews were transcribed and coded for analysis using NVivo. I began with a set of coding categories corresponding to core aspects of program implementation (e.g., waitlist management, selection processes, income certification, search assistance) before coding specific program information within these categories, including how many applicants were on a waitlist, when a waitlist was last opened, and whether agencies conducted randomized lotteries. I then coded for broader, cross-cutting themes that emerged across multiple aspects of program management, including instances of administrative burden faced by program clients and references to limited staff resources that hindered program implementation.

To augment these interview data, I collected written material from housing agencies about their voucher programs. Typically, this included briefing packets given to voucher households, maps of "opportunity neighborhoods," and information designed to improve the search process. Some of these materials were adopted from HUD, but most material was created directly by the housing agencies to assist clients. Additionally, I read through portions of the administrative plans submitted to HUD and, for agencies in the Moving to Work (MTW) demonstrations, I reviewed written reports and self-evaluations. From these supplementary documents, I was able to independently evaluate briefing materials, learn how agencies represented their policies to HUD, and consider the degree to which written policies corresponded to information provided during our interviews. Because I did not participate in tenant briefings, directly observe intake procedures, or engage with tenants in their housing search process, my data focus on how agency officials described their work, rather than providing direct observations of program clients.

FINDINGS

Selection: Identifying Market-Ready Renters

As PHAs select clients for the Housing Choice Voucher program and navigate them through the intake process, agency officials regularly evaluate the market preparedness of these clients. Households selected from the waitlist must quickly comply with a series of mandated steps before leasing an apartment. They must respond to their selection letter, certify their eligibility for the program, and engage in a housing search on the rental market. Performance rituals and procedural hassles provide agencies with information to evaluate the market-readiness of prospective clients. They use these processes to weed out households unlikely to succeed as market actors and direct their scarce resources to those deemed capable of navigating market relationships.

Client selection. Households selected from the Housing Choice Voucher waitlist receive a letter from the PHA inviting them to certify their eligibility during an intake session with a voucher specialist. These letters mark the first step toward participation in the Housing Choice Voucher program, but agency officials regularly report difficulty in locating selected clients. Program applicants often use a temporary address when they sign up for the waitlist or they move residences (and switch telephone numbers) without updating their contact information at the housing agency. As a result, the initial selection process disadvantages applicants with an unstable residential situation and favors those with permanent addresses (Kim 2022).[11] Households that fail to respond to their selection letter (often, because they did not receive the original notification) forfeit their spot on the waitlist.

Although this initial step is simply designed to notify households of their selection into the program, it serves as the first opportunity for agencies to evaluate potential market performance of selected clients. Every agency reported that a nontrivial share of selected households fail to respond to their selection letter. "We'll pull 50 or 60 [applicants] from the waiting list, send out letters. From that 50 or 60, we'll get maybe 30 [applicants] that will actually respond. Only 30 will come in for the briefing," reported one agency director. This failure to respond to the selection letter is the first point of attrition for applicants waiting to enter the program.

"This is the letter that you would get," noted the director of another agency, holding a one-page note in her hand. "'Your name is coming up to the top of the waitlist. You've been scheduled to come in for an interview to see if you qualify and are eligible for this program.' Out of that 100 [selected applicants], 70 percent come in. Another 30 percent, they just don't show up. We give them a second appointment. Two times—we give them two chances in order to get in here. By the second time they haven't responded, then bye-bye." Other agencies were even stricter in their selection protocol. Instead of following up with households who failed to respond to the initial letter, these agencies offered only a single outreach before selected households forfeit their opportunity for assistance. With thousands of applicants awaiting assistance, the director of a large, urban agency explained that households that failed to respond to a single selection letter would be replaced with another household on the list: "Especially with this new [wait]list, you get one letter. If you don't come in, you're withdrawn because we have such a long list."

Previous fieldwork with applicants to the Housing Choice Voucher program underscores the consequences of these strict selection procedures for individuals on the waitlist. Writing about the housing search in Mobile, Alabama, DeLuca and colleagues (2013:277) describe an applicant who missed her selection after five years on a waitlist: "She missed the call from the housing agency telling her that her number had come up because she was at work the day they called. When she called back the next day, she had lost her spot." This was not an isolated incident for the families DeLuca and colleagues (2013:278) interviewed. Other respondents reported that, by the time they received their notification letters, they did not have enough time to bring the required paperwork to the housing agency. Because the HCV selection procedure assumes households on the waitlist have a steady residential address, or a person or place that holds their mail for them, it overlooks the residential challenges common in the lives of the poor (Desmond, Gershenson, and Kiviat 2015). Households without a permanent address are often the neediest on the waitlist, but they may also be the least likely to keep an up-to-date address on file with the housing agency. As the first step in the selection process, this initial letter notifying applicants of their selection from the waitlist serves to eliminate unresponsive clients from the program.

Program certification. Once households respond to their selection letter, the housing agency invites them to perform a series of administrative tasks required to certify their program eligibility. Each household member is required to attend an initial intake meeting. Households provide documentation qualifying them for the program, including documents verifying their income, citizenship status, and residency. Only after households are certified eligible are they scheduled to attend a formal program briefing and issued a voucher.[12]

Agency officials described the deluge of paperwork that clients are required to submit to certify eligibility for the Housing Choice Voucher program. These types of administrative burdens (e.g., excessive paperwork or complicated documentation) are onerous and often discourage qualified households from pursuing public assistance (Herd and Moynihan 2019). Burdensome processes decrease the likelihood that selected clients will complete the certification process and ultimately reduce the take-up of social policies. Officials regularly acknowledged the hassles imposed on selected clients as they gathered paperwork to certify their eligibility. One agency director described the step-by-step process used by her intake specialists:

> Do they live or work in [the] county? We need proof of residency. Do they meet the income limits? It's certain income limits [depending on] the number of household members. The income information has to be current. It can't be old and it needs to be within the past 60 days. We require four current, consecutive pay stubs or a letter from an employer. And do they have a criminal record? We're gonna run a criminal background check. Provided that they get the green light on all of those, then they would look for permanent documents: Social Security cards, birth certificates, resident alien information. . . . They go through the whole litany of information.

Selected households that fail to provide the required certification paperwork must reschedule their intake sessions. "Some [selected clients] don't come prepared, so we'll need to reschedule," noted one agency director. "And then some of them can't prove the live or work preference. Some of them are over income, and some of them fail to provide paperwork. Those are the most common things why they don't get the voucher." When they cannot provide the required paperwork, selected households forfeit access to the voucher program.

Beyond these program-wide certification requirements, most agencies maintain preferences that rank-order selection from their waitlists. Common preferences include the prioritization of homeless households, rent-burdened families, or a residency preference for those who live or work in the jurisdiction (Congressional Research Services 2012). When clients are selected under one of these preference categories, they are required to verify their preference eligibility during the intake interview. But as many agency officials noted, documenting preference eligibility often proves challenging for clients. What paperwork is required to verify homelessness? How do poor families selected under a rent-burden preference prove this when monthly income fluctuates regularly? What type of employment qualifies an applicant as a working household? As the director of a medium-size county agency noted, even verifying a residency preference—by far, the most common preference used by local agencies—is administratively difficult:

> Our experience with anything that involves proving that you live somewhere is very burdensome for applicants to prove, particularly if they have been homeless. If you've been couch surfing for months and your stuff is all in a box, it's really hard to find that little agreement from two years ago that says you used to live in [this county]. . . . We try to have a minimal amount of preferences that are relatively simple for people to verify. It is administratively burdensome, but it's also a burden on the applicants. Our experiences is that, if you have really overly complicated preferences, it is super hard for people to prove that they qualify for that preference. . . . If it's creating more hoops for them to go through, it makes it really tough.

Several agencies cited the excessive administrative burdens as a reason their agencies stopped using preferences in the selection process, and others simply noted that these preference structures imposed another bureaucratic challenge (and layer of paperwork) for clients during their intake session.

Eligibility certification and preference verification are designed to guarantee that selected households meet the baseline program requirements, but they also weed out clients who are unable to navigate these administrative hurdles (Herd and Moynihan 2019). Performing these basic administrative tasks (e.g., attending a scheduled meeting with an intake specialist or verifying employment records) are analogous to the tasks expected of renters on the private market. Successful renters will need to schedule a meeting with their landlord and provide documentation about their rental history. Landlords regularly ask clients to engage in these types of tasks when they view apartments and sign leases (Garboden and Rosen 2022). The certification process primarily aims to confirm program eligibility, but it serves a secondary purpose by enabling agencies to evaluate market-readiness. When selected clients are unable to complete these mandated steps, agency staff typically assume they will be unable to complete parallel steps necessary to secure a unit on the rental market.

The housing search. Once clients are certified as eligible and issued a voucher to begin their housing search, housing agencies typically give them at least 60 days to find a suitable housing unit before their voucher expires.[13] During this search period, agency officials regularly refer to voucher clients as "shoppers"—a term that reinforces the market-oriented nature of the housing search.[14] When this initial search period expires, housing agencies use their discretionary authority to extend the search window, but they often do so only after clients demonstrate the effort they have put into their housing search. To this end, many agencies require clients to keep a log of the units they visit or provide a "proof of effort" worksheet to quantify their housing search. This process enables housing agencies to identify clients deemed unserious in their search, or clients they believe will be unlikely to find a unit on the rental market.

The program director in one medium-sized city explained that unsuccessful shoppers are automatically granted a single, 30-day extension to continue their search. After the initial extension, the housing agency requires clients to demonstrate a "good faith effort" to earn additional extensions:

> We issue initially for 90 days. After that 90 days, they can ask for an extension and we'll usually do the extension for 120 days. And then they can ask for an additional extension after that, but it has to be approved by a manager, so they have to show that they've basically been making a good faith effort towards trying to find a place to live.

Shoppers in this jurisdiction are required to document their housing search by submitting a search log tracking each property they visited. Another agency director described a "proof of effort" worksheet her agency requires clients to complete before asking for an extension to their search period:

> We do 60 days first and then we extend 30 days at a time up to 120 days. It's pretty simple. With their RTA [Request for Tenancy Approval] packet, we give them a proof of effort worksheet. They write down where they've been looking because we just want to see. Have you been looking and you haven't found anything? Or you just have not looked and are asking for an extension?

By requiring clients to document their search and report back to the housing agency, agency officials are able to evaluate the perceived seriousness of shoppers. These worksheets enable housing agencies to distinguish between shoppers who take the housing search seriously and those they believe are unlikely to succeed. If the agency decides not to extend the search period of unsuccessful shoppers, it can re-issue the voucher to another household on the waitlist.

Handouts provided to clients at the briefing session reinforce the importance of documenting a housing search. At a medium-sized agency in a high-cost city, one handout implores clients to keep an organized record of their search process and maintain a log tracking outreach efforts to landlords. The handout encourages shoppers to "properly track your apartment outreach" and have "an organized list of the landlords you've contacted and when." It reminds them of the importance of documenting their "hard work" in case they need to request an extension to their search period. Self-documented housing search logs create a paper trail for agency officials as they evaluate clients' performance on the rental market. By tracking the landlords they contacted and listing the apartments they visited, shoppers are demonstrating their deservingness when asking for an extension to their search period. Carefully monitoring the search behavior of assisted households enables PHA officials to evaluate whether clients have *earned* an extension on their housing search. By evaluating market performance, PHA officials craft norms of deservingness around the receipt of a scarce public resource, like housing vouchers. Together, these selection processes contribute to poverty governance by demarcating the boundaries of market readiness and withholding scarce resources from clients deemed unprepared for the rental market.

Formation: Teaching "Soft Skills" for the Rental Market

After certifying households as eligible for the program, housing agency officials convene mandatory voucher briefings to convey basic program rules, including information about payment standards, utility allowances, and portability policies (McCabe and Moore 2021). Along with providing an overview of the voucher program, these sessions also teach clients "soft skills" that agency officials believe are required to effectively navigate the private market and succeed as market renters. This process suggests that many

PHA officials believe their clients lack the basic cultural competencies required to successfully search for housing. Officials also hope that teaching cultural competencies will ensure clients do not lose their vouchers due to non-compliance with expectations of market renting after they have signed a lease. This process of formation introduces behavioral modifications, both in the search for housing and the maintenance of tenancy, that are central to the project of governing poverty.

Selling themselves to potential landlords. Landlords regularly screen voucher clients to identify applicants likely to be "good tenants" on the private rental market. Rosen and Garboden (2022) note that landlords rely on "subjective—and generally illegal—tenant signifiers such as their appearance, demeanor, family status, and expressed racial identity" to identify "good" tenants. Acknowledging the prevalence of these screening practices, PHA officials regularly remind clients that a carefully curated self-presentation is central to a successful housing search. They counsel clients on how to approach landlords, inquire about rental listings, and sell themselves as prospective tenants. This includes basic guidance on how to dress, what to bring (or not to bring), and how to make a positive first impression. Recognizing that many of her clients had little experience navigating the rental market, one agency director in a high-cost housing market explained the importance of selling yourself:

> Some people have never had to do this [rent an apartment] before. You may have people who come in to your office and they may have, like, tattoos on their faces, and they may, like, be wearing tank tops, and they may be kind of gruff, and may not have a lot of personal skills and stuff like that. We tell them, "If you're going to go look for housing, go to the place. Dress nice. Be very nice. Make sure that you have a good, calm demeanor. Go and tell the landlord why you would be a good tenant for them." Even though [landlords] say, "Oh, we don't take Section 8," don't let it stop you. Say, "I understand you don't take section 8; however, I will be a very good tenant for you because this is why."

This agency director acknowledged the prevalence of source of income discrimination, but suggested that a positive self-presentation could help shoppers overcome this barrier.

This type of advice on how to dress, when to visit, and how to behave was ubiquitous across agencies. The director quoted above noted that her advice was not fool-proof, but she maintained that building rapport with landlords was a critical skill for voucher holders: "It won't always work—and it won't even work most of the time—but sometimes it does and that sometimes could be the time that you lease up. A lot of times, it is just a personality game. You have to go out there and really sell yourself." The director herself doubted the sufficiency of these behavioral modifications "most of the time," but she acknowledged that building rapport with landlords would "sometimes" be enough to push clients toward success.

These simple admonitions to dress nicely or leave a positive first impression are reinforced by the written materials made available at voucher briefing sessions. For example, a handout distributed by one large PHA included suggestions about approaching the property owner like you are going to a job interview. It reminded clients that first impressions are formed during the initial interaction. The handout likened landlord decisions about prospective tenants to employer decisions about prospective employees. "When you go looking for a new house or apartment, you should treat the visit like job interviews," the brochure read. "At your first meeting, owners will decide if you will be a good neighbor and tenant, just like a company would decide if you would be a good employee. Dress appropriately and be courteous." At another large housing agency, the participant handbook included several tips for making a positive first impression: "Leave the children at home. Present yourself to the landlord in the best way possible. This would include making sure you have dressed properly. Many landlords may not consider the family for a unit if they are not well dressed. Have a positive attitude."

Ultimately, these handouts made it clear that voucher clients bore the responsibility of selling themselves to prospective landlords. Clients needed to convince property owners of their worth as prospective tenants. One briefing booklet advised:

> When you have found a unit that you want, your mission is to convince the landlord that he should rent the unit to you. . . . Now is the time for you to let the landlord know why he should select you. Show him your current rent receipts. Give him references. If you have children, explain how well behaved they are and what types of grades they are making in school. . . . Let him know what a good housekeeper you are and invite him to come to your current unit. If you have a bad credit report or have been evicted in the past, talk honestly with the landlord and explain your situation. This is your time to shine.

Often, agency officials pushed beyond this basic advice to encourage clients to proactively improve their position on the rental market. To do so, officials at several PHAs suggested clients create a housing history, get references, or find advocates to support their candidacy. For example, in one high-cost, medium-sized city, the agency director encouraged clients to prepare photographs of their existing housing units and gather recommendations from their children's teachers to bolster their position on the market:

> If you're currently housed, take pictures of how you maintain your unit. If you have kids in school and your kids are doing well, get letters from the teachers. If you go to a job every day and work 10 hours a week, if you're reliable, if you are a person who is kind to people and doesn't fight people or if you volunteer, if you work at your church, you need people to buy into *you*—not necessarily just the voucher.

These suggestions went beyond basic behavioral tips about how to dress or what to bring. Given persistent stigma associated with rental assistance programs, agency officials often encouraged clients to go beyond the requirements of typical renters to convince landlords they would be "good tenants."

Housing agency officials were especially mindful of these extra efforts when clients entered the rental market with poor credit histories, eviction records, or other blemishes on their housing record. Clients were often encouraged to know their credit score and prepare a narrative to explain their housing history. Prepping her clients for the challenges of the rental market, one agency director offered this approach to navigating these issues: "We explain what [clients] need to do. . . . Go pull your credit report for free, carry it with you. You'll save some money by paying 30 to 50 [dollars] every time you go and apply. If you have anything on your credit, be upfront. Let them know if there's any issues." Other agency officials reminded tenants that landlords regularly conduct criminal background checks, so clients should be prepared to explain their criminal history.

Perhaps most critically, housing agencies emphasized the challenges of navigating eviction records for landlords. Acknowledging the prevalence of evictions among low-income renters, the director of one medium-sized agency encouraged clients to proactively address their eviction history. Describing the agency briefings, he acknowledged that clients often had an explainable eviction record, but landlords were often quick to dismiss these applicants: "Maybe it's the only eviction that they have, but they've been a renter for 15 years. How do you teach someone to explain that in a way that doesn't make a landlord say oh, no, no, I see an eviction and we're done?" To successfully navigate the rental market, clients with eviction histories needed to explain the circumstances through a carefully curated housing history.

Most agency officials noted that they emphasize these "soft skills" during informal discussions and mandatory client briefings, but a handful of agencies offer more formal training programs to renter households. Often, these briefings are contracted out to community partners to conduct on behalf of housing agencies. For example, one large housing agency offers an optional, 12-hour *Ready to Rent* course designed to teach clients about the basics of renting on the private market. Other agencies regularly refer clients to rental training programs run by the state government or community organizations. One initiative run by a nonprofit offers a 15-hour tenant education course that includes information on "the rental screening process, how to talk to a potential landlord about screening barriers, credit repair and building, how to maintain a healthy home, the eviction process, and much more" (RentWell 2017). According to several agency officials, when clients complete these types of renter certification courses, they gain additional skills to succeed as market renters. Especially for clients with a checkered housing history, agency officials believe that completing a training program signals to landlords that clients have learned valuable tools for success on the rental market.

Behaving like a model tenant. Succeeding as a renter on the private market requires that tenants not only find a suitable unit, but that they maintain their residency without breaking the terms of the lease. To do so, tenants must conform to the expectations of "upstanding renters." They have to act like "responsible community members" and "good neighbors." Doing so requires them to clean their homes, take out the trash, and engage in proper housekeeping techniques. Subtly acknowledging perceived deficiencies of voucher clients, housing agency officials regularly emphasize these dimensions of renting as necessary soft skills for market success.

Maintaining their position as upstanding renters starts with clients paying their rent on-time. The director of a medium-sized housing agency acknowledged that this simple admonition seems paternalistic, but he emphasized the value of reinforcing this behavior to voucher clients:

> You're coming in for the briefing and you're certainly going over how to approach things. . . . I hate that we had to say it, but, "Pay your rent before your cable bill. Pay your rent before your cellphone bill." I mean, you have to tell them these things. They have to really understand the fact that you're going into a situation where there are people [living] above, below, or around you that can hear you, that are impacted by you.

Acknowledging that the success of the voucher program hinges on clients succeeding as market renters, agency officials regularly returned to these basic admonitions in their interactions with voucher clients. They also worked to educate tenants about the other responsibilities of upstanding renters. They highlighted good housekeeping techniques and emphasized the property maintenance responsibilities of model renters. They explained the consequences of non-compliance with various provisions of a private lease. Agency officials reminded clients that the lease is a contract between two parties, and that renters are required to uphold their end of the agreement or risk removal from the property. Together, these types of basic reminders highlight the paternalistic approach taken by agency officials to remind clients of the proper behavior of market renters.

Being a good renter also means being a good community member. Housing agencies reminded tenants that success on the rental market meant more than simply abiding by rules within your own home. The tenant handbook at one large housing agency offers an entire section dedicated to being a *positive part* of the community. It reminds clients that their neighbors are watching to evaluate their own "self-respect," and the way they are treated in the community will depend on the impressions they give off. The handbook includes subsections on behaving properly in the community, including sections on "Make a Good First Impression When You Meet Your Neighbors," "Be a Good Neighbor," and "Keep Your Unit Clean – inside and out." This section offers basic housekeeping tips, including an admonition to use curtains, rather than sheets, to cover windows; to wash dishes after every meal; and to choose dedicated places to store clothing and kitchen items. Through briefing materials that remind clients of the virtues of proper housekeeping, agencies take it upon themselves to outline expectations for good renters, likeable neighbors, and upstanding community members. Again, these efforts to identify model behaviors underscore the perception that voucher clients broadly lack the cultural competencies or social understandings required of successful market actors.

As they push clients to learn "soft skills" and model behaviors, housing agencies invest in processes of market formation intended to improve outcomes on the rental market. From the moment clients begin their housing search, housing agency officials remind them about the importance of selling themselves to prospective landlords by offering pointers, suggestions, and reminders to guide their interactions. After they secure a housing unit, housing agency officials reinforce the behavioral expectations associated with upstanding renters, including the importance of abiding by lease rules and engaging positively in their communities. By emphasizing the development of these "soft skills," PHAs work to ensure that clients are self-governing market actors capable of independently navigating the housing market.

Nudges: Overcoming Obstacles on the Rental Market

Even when voucher clients are well-prepared to navigate the rental market, they regularly struggle to secure housing through the voucher program. Structural impediments, including low vacancy rates, high rental costs, and persistent discrimination, constrain their housing search. When clients struggle to find a unit, agency officials may steer them toward landlords who are more likely to accept vouchers. Even after clients successfully sign a lease, agency officials intervene in landlord-tenant relationships to remind clients of their responsibilities as market renters and reassure landlords of the guiding hand of the state. These market nudges govern the poor by emphasizing market fundamentalism while simultaneously maintaining a watchful gaze over landlord-client relations.

Steering tenants. As clients begin their housing search, public housing agencies offer several tools to assist them in finding housing. Most agencies keep printed listings of available rental units, although these listings are largely outdated and incomplete. Some housing agencies offer formal counseling, often conducted by local nonprofit organizations, to improve access to high-opportunity neighborhoods (Bergman et al. 2019). In addition to these formal resources, officials regularly draw on their own networks, knowledge, and connections to private landlords to assist voucher households. At some agencies, local housing inspectors offer an unexpectedly valuable set of resources when clients struggle to find a suitable unit before their vouchers expire. Because these inspectors regularly interact with landlords and liaise with property owners, they develop relationships that prove useful in placing clients.[15] Previous research on city housing inspectors shows that frontline workers subjectively evaluate the worthiness of property owners when deciding how to allocate code violations (Bartram 2019). In the case of housing agencies, inspectors serve as intermediaries who are able to draw on first-hand relationships with landlords or building managers to assist struggling families. Highlighting their unexpected role in the search process, the agency director in a medium-sized county detailed the importance of her agency inspectors in this process:

> I have two inspectors that get to know on-site property managers, and they really do establish relationships with them. They kind of act as mediators. When we know a family is really struggling [to find a unit],

> we get the inspector to kind of connect with them. We're not supposed to do that. It's called steering. Not steering, but my God, you need to help them [find a unit] so we do it in the low-key kind of way. It's not great because these landlords are obviously friendlier because theirs aren't the greatest properties in the world, but also it's better than the streets.

The agency director later referred to landlords with more lenient standards, or those willing to rent to households with a tarnished rental record, as "felon-friendly" landlords.

Housing inspectors are particularly helpful in assisting clients with immediate housing needs. The director of a large, urban housing agency reported that his inspectors can utilize long-standing relationships with building managers to quickly match clients with housing units:

> [We were working] to start building our database of units and being able to find available units when we need one just by picking up the phone. Our inspections department actually does a great job of that already because they have direct contact with all of the property managers. Some of them are very large so when somebody needs a unit—somebody is in dire need of a unit because there's a fire or something like that—our director of inspections knows a ton of people. He can always just pick up the phone and find another unit. That's kind of a good resource that's always been on tap.

Although the connections made through building inspectors are not available to all searchers, they are a valuable resource for housing agency officials working to smooth the experience of clients experiencing difficulty on the rental market.

Along with matching clients with specific landlords, agency officials use other tactics to steer clients toward sections of the market where they are more likely to succeed. In her work on Baltimore, Rosen (2014) describes a sorting process where landlords with difficult-to-rent units match hard-to-house voucher clients to those units. This process occurs just beyond the purview of the housing agency, but practices within many agencies facilitate this matching process. By and large, this process does *not* focus on directing clients to specific neighborhoods, although officials do acknowledge that voucher clients are often more successful in some communities than others. Instead, housing agency officials identify particular types of landlords they believe are more likely to accept voucher households. For example, small landlords, or mom-and-pop shops, are often more lenient than larger management companies when it comes to overlooking blemishes on a housing record. "If I've got clients that have not the best credit history that are trying to find a place, then I will suggest that they try to find for-rent signs and find a mom-and-pop-type thing that might be more willing to work with them," the director of a small agency reported. By directing clients to landlords with lenient screening criteria, agency officials are able to smooth the challenges of the rental market for voucher clients.

Housing agency officials acknowledge that many large apartment complexes run by property management companies are less flexible in their screening criteria. "When you get into the larger complexes, it's a lot more regulated and they have their policies that they have to follow because they have to be equitable to everybody. So if someone's got bad credit, they could probably [decline them] right off the bat. They're not gonna even be looked at as a potential tenant," noted the director of another agency. Because apartment complexes often have standardized application procedures, voucher clients are unable to personalize their application, explain their eviction history, or offer a personal narrative to convince landlords of their worth as a tenant. An agency director noted that without the ability to sell themselves to prospective landlords, voucher clients are often less successful in these communities:

> You know, [in] apartment complexes, you tend to be a number. . . . You fill out the application. They send it to corporate. It

> comes back yes or no. Whereas a private landlord can sit down with you. You can say, "This is what happened in 2010, you know, I was going through a divorce, you know, there were credit issues." And then they can decide, based on that conversation, whether or not you'd be someone they would select.

Although these are not hard-and-fast rules—after all, many voucher households live in large apartment complexes, and plenty of mom-and-pop landlords discriminate against assisted families—these shorthand rules characterizing landlord behavior highlight the ways agency officials draw on localized knowledge of housing markets to nudge their clients in particular directions. By matching clients with "felon-friendly" landlords, encouraging them to visit mom-and-pop landlords, or connecting them to landlords already participating in the program, housing agencies work to smooth the burden of the rental market.

Mediating landlord-tenant disputes. Once clients successfully sign a lease, most housing agency officials profess little further involvement in landlord-tenant relationships. Referring to these relationships as private, contractual relationships, they note that disputes should be resolved by the parties themselves (or, in extreme circumstances, through the court system). But although agency officials explicitly disavow any obligations to referee landlord-tenant disputes, many still become involved in these relationships to nudge tenants to comply with provisions of their lease. They often wield the threat of voucher termination to reinforce the norms of market tenancy, and they use their power to reassure landlords of the watchful paternalism of the state.

Agency officials cannot explicitly enforce lease provisions, but they can, and often do, gently nudge clients to comport to the norms of upstanding renters. Asked whether her agency ever gets calls from landlords complaining about a tenant, the director at one medium-sized housing agency responded, "All the time. All the time." Asked how the agency responds, she pointed to the gentle hand of the housing agency:

> It depends on what's happening. The client knows their responsibility to the program. . . . A landlord could call and say, "I haven't heard from Miss Smith, she has not paid her rent in five days." Okay, I will try to reach out to her and we will send her a reminder letter rent is due by the first [of the month] and no later than the fifth. If you keep getting the repeated lease violations, we remind them that the owner could take you to court and start the eviction process.

Although housing agencies are not responsible for collecting rent, they can intervene to remind tenants of their responsibilities as market actors, including the foremost obligation of paying rent.

Housing agencies are most often called on to nudge tenants with missed rental payments, but they are asked to mediate other lease violations, too. A voucher specialist at one medium-sized, suburban agency offered another example:

> [Landlords] will call us for things like, "She has a dog." "Okay, well sir, what's in your lease?" I ask. "No dog." "Alright, if you can't resolve it with her, that's a court matter. The housing agency can't get rid of the dog," I tell them. Oftentimes, they end up with me and I try to help them work out a solution, but like I said, I can't enforce his lease. I'll try to help them, but if that doesn't work then you'll have to take them to court. . . . We try to work it out, but at the end of the day, we're not the dog catcher.

This scenario underscores the enduring role of housing agencies after a client has leased a unit. Although they are not formally responsible for mediating landlord-tenant disputes, agency officials continue to intervene in these market relationships to secure a successful resolution. The director of another large, urban agency repeatedly emphasized that her agency was *not* the referee, but she simultaneously acknowledged their role in bringing landlords and tenants together to resolve disputes.

Some agencies intervene in landlord-tenant disputes only when the voucher is at stake. The director of one agency described a scenario in which a private landlord asked the housing agency to intervene on their behalf. Relying on nudges to the client, she referred to her agency as the buffer when clients are at risk of losing their vouchers:

> You know, we may step in and call [the client] and say, "Hey, we got this call, what's going on, explain your side. You know, this is a part of the program, you can't have these violations. What's going on? Maybe you need to go over and apologize." So we kind of are like the buffers . . . because we always say that landlord-tenant issues are landlord-tenant issues. We only step in is if your voucher becomes in jeopardy.

In this case, housing agency officials were quick to clarify the limits of their involvement. Although they cannot enforce the terms of a lease, they can exercise authority to nudge clients when the lease violations become serious.

Involvement in private landlord-tenant relationships serves the dual purpose of nudging voucher clients to comply with their responsibilities as market renters and reassuring private landlords of the power of the state. Although PHAs cannot enforce lease provisions, agency officials acknowledged that they can wield the threat of voucher termination as a decisive reminder to clients about the expectations of private market renters. At the same time, these interventions served to reassure landlords of the mindful eye of the housing agency. Voluntary landlord participation is critical to the success of the Housing Choice Voucher program, so agency officials are often particularly diligent in responding to landlord concerns. "Any way we can get landlords to buy into our program—we try to give them good customer service. If they have a complaint, we try to respond quickly and help them to resolve that because we need them," noted a director of one agency. Client nudges served as a form of customer service to the landlords. They reaffirmed the role of agencies as committed partners in working with landlords to ensure the smooth functioning of the low-income rental market.

Reinforcing this commitment to private landlords, the director of one agency recounted the story of a local management company that considered rejecting voucher applications outright because of the perceived challenges of working with program clients. To reassure the management company, the agency director promised his partnership in serving voucher clients:

> If the program is run well, which ours was, and management at the apartment complex understands that they have the housing agency's full support in making sure that the tenants do the right things. . . . We're not the police, but we are kind of the police. You know what I mean? We support them [the landlords]. If they need to get them [tenants] out of there, they're damaging [the unit], we'll terminate them, we'll work with them and they understood that.

Only once the housing agency agreed to police the behavior of voucher tenants on the private market did the company agree to lease units through the Housing Choice Voucher program.

Together, these market nudges point to an important mode of governing poverty through the Housing Choice Voucher program. Rather than weeding out unprepared clients (selection) or providing selected ones with the skills to navigate the rental market (formation), these interventions reinforced market fundamentalism and the disciplinary role of the state. Even after the lease signing, these nudges remind clients of the power of the state to discipline them for their failure to comply with market expectations. Although PHAs proclaim non-involvement with the landlord-client relationship, my research suggests they often continue to play a role in reminding clients of their obligation as market actors and reassuring landlords of the protective power of the state.

DISCUSSION AND CONCLUSIONS

In this article, I presented a tripartite framework of selection, formation, and nudging to understand how PHAs govern poverty through the Housing Choice Voucher program. I introduced the housing market as a critical site to study these practices, but my analysis centers on how administrative decisions made by street-level bureaucrats create successive opportunities for the state to govern the poor. In the voucher program, PHAs evaluate the market readiness of prospective clients, intervene to improve their chances of success on the rental market, and discipline their non-compliance. I argue that these practices create new categories of deservingness for rental assistance that focus on evaluations of market preparedness and performance.

While my research centers on local housing agencies, the framework of *selection, formation*, and *nudging* provides purchase for social policy beyond the provision of rental assistance. To begin, many government programs with scarce resources require street-level bureaucrats to *select* participants into their programs. Even outside of lotteries as a selection tool, state agencies rely on other administrative decisions to restrict access, weed out applicants, and prioritize certain types of households. For example, in the context of overwhelming demand for seats in high-performing charter schools, school districts select families to attend those institutions. Everyday administrative decisions about *how* to accept applications, *whether* to prioritize certain types of households, or *how* to educate parents about school choice shape the selection process. They affect the resources available to parents, the likelihood of families applying, and the way children are picked.

Selection processes occur in landlord-tenant courtrooms, too. Without a guaranteed right to counsel, pro-bono attorneys can only provide legal counsel to a sliver of tenants facing eviction, thereby requiring them to engage in selection processes to decide which tenants gain access to counsel. Similarly, when local jurisdictions pilot social policy programs, including cash assistance programs, they often select among eligible households to participate because they lack the resources to provide for everyone. City officials in Washington, DC, recently funded a pilot program to provide direct cash assistance to new and expectant mothers living in low-income neighborhoods. With only enough funding for 130 mothers, the city (and its nonprofit partners) had to select households to participate in the program.[16] Ultimately, any social policy program *not* distributed as-of-right involves selection from the state, and these selection processes create opportunities to manage and classify the poor.

On the practice of formation, my analysis deepens sociological theorizing about the role of behavioral modifications in promoting market discipline. In the case of the voucher program, these modifications govern poverty by encouraging clients to abide by the norms of the housing market. But this reliance on the private market is not unique to the field of rental assistance. In fact, it is a central feature of social policy under neoliberalism. Workforce training programs emphasize market readiness as a condition of job readiness (Miller 2014). Medicaid relies on program recipients navigating private-sector medical services (Maskovsky 2000). Housing First solutions emphasize market discipline as a pathway out of homelessness (Hennigan 2017). By showing how administrative choices enable the evaluation, reinforcement, and commitment to market discipline, my approach highlights the realignment of state goals with those of market actors.

Finally, I offer a framework for *nudges* that emphasizes the disciplinary role of the state to address non-conformity in the rental market. Nudges are designed to change tenant behavior, but I argue that these practices are performed largely for the benefit of the landlord. When street-level bureaucrats remind clients to behave like market actors and uphold the expectations of upstanding renters, they are exercising the disciplinary hand of the state on behalf of their private market partners. Like other state agencies engaged in partnerships with market actors, PHAs need the continued, voluntary participation of landlords to successfully implement their program. By enacting the disciplinary power of the state on behalf of private market actors, these nudges lessen landlords' disciplinary obligations while reinforcing the state-market partnership.

The tripartite framework documents *how* PHA administrators utilize everyday administrative choices to manage residentially-insecure households, but it leaves largely unanswered questions about *why* they participate in these practices. Given the already-heavy burden of administering the Housing Choice Voucher program, the tasks of poverty management appear (on first blush, at least) to increase the workload of local agency officials. These efforts may be effective in helping clients secure housing on the rental market—or at least PHA administrators may perceive them to be effective. Because PHAs have few tools to address structural obstacles to the rental market (e.g., the lack of affordable housing units, patterns of housing market segregation), they may turn their efforts to ensuring that only market-ready renters enter the uneven marketplace (and those who enter the rental market are equipped to succeed).

Importantly, my research suggests PHA officials recognize that landlords in the low-income housing market screen prospective clients through home visits or informal evaluations—an observation confirmed by recent qualitative evidence describing the racialized and gendered stereotypes deployed to do so (Rosen, Garboden, and Cossyleon 2021). However, my interviewees regularly expressed skepticism that their admonitions to dress nicely or act politely would systematically help voucher clients overcome stigmatization and discrimination in the rental market, ultimately raising doubts about the utility of these behavioral modifications.

If PHA administrators doubt the effectiveness of these practices to improve market performance, what accounts for their efforts to select, form, and nudge clients in the Housing Choice Voucher program? One possibility points to the benefits that accrue to agency administrators from governing the poor, rather than any benefits that accrue to program clients themselves. By screening clients prior to their selection into the program and demarcating the boundaries of governability, PHAs are able to more efficiently deploy scarce resources. By eliminating households during the selection process who were considered the *least likely* to succeed on the rental market, PHAs may ultimately save themselves from investing resources in clients who are *not* market-ready. Similarly, by intervening in landlord-client relations *after* clients have leased a rental unit, PHAs may avoid the burdensome process of selecting replacement households and shepherding them through the rental process. In this case, poverty management tactics may create efficiencies and decrease the workload on program administrators, rather than providing direct benefits to clients. This rationale applies broadly to street-level bureaucrats in resource-strapped agencies who seek to lighten the administrative burdens of policy implementation.

A complimentary explanation ties the practices of poverty governance back to the performance metrics at the heart of the decentralized project of neoliberalism. As I noted earlier, funding for the Housing Choice Voucher program is allocated by HUD to local PHAs. These agencies are evaluated annually on their performance through the Section Eight Management Assessment Program (SEMAP), which includes a measure of their utilization rates, or the percent of their allocated budget used to pay rental assistance on behalf of clients.[17] Budget utilization rates rise when clients succeed in the rental market, and they fall when clients fail to find housing. If PHAs fail to utilize their full budget authority, they risk receiving a smaller budget allocation in the subsequent year, resulting in less funding to pay the rents of assisted households. Thus, the federally-mandated, metric-based funding structure creates incentives for PHAs to send market-ready clients into the housing market and ensure their success.

But this organizational logic tying agency success to market readiness also operates in a second way. Along with providing the funding to pay rental costs, the federal government also pays PHAs an administrative fee to cover the costs of running the voucher program, including staff salaries and other programmatic costs (U.S. Department of Housing and Urban Development 2015). These fees are allocated to PHAs based on the number of units under lease each month (i.e., the number of clients actively renting housing units). When agencies have more vouchers under lease, they receive higher administrative fees. But many of the administrative tasks required to run the Housing Choice Voucher program (e.g., maintaining waitlists, certifying program eligibility, and building relationships with community actors) are performed *before* clients even enter the rental market. Because nearly every local housing agency relies exclusively on federal funds to cover the administrative costs of the program, diminished fees create financial challenges for housing agencies. When agencies fail to prepare their clients for the rental market, or when clients search for housing but are unable to sign a lease, the agency receives no return on their investments in the early stages of the program. Interviewees rarely made the direct connection between the market-readiness of their clients and their annual funding allocations, but they regularly alluded to the importance of reaching utilization goals, collecting administrative fees, and maximizing their budget utilization. With funding allocations and SEMAP scores linked to agency performance, the Housing Choice Voucher program illustrates how the abstract principles of neoliberal governance shape on-the-ground practices of state actors.

By focusing on rental assistance, this article underscores how deeply market-based social relations have saturated the way America's most vulnerable renters fulfill their housing needs. Nearly all affordable housing programs rely on the private rental market to generate affordable housing, but the limits of these market-based approaches are increasingly evident. Rising cost burdens, deepening housing instability, and skyrocketing rates of homelessness underscore how the private rental market fails to adequately provide for the most at-risk families (Desmond 2018; Joint Center for Housing Studies of Harvard University 2019). Reforming U.S. housing policy to meet the needs of the most vulnerable renters must begin by reforming the Housing Choice Voucher program. To start, rental assistance should be guaranteed through a universal voucher program (Reina, AIken, and Epstein 2021). By empowering PHAs to provide rental assistance to every income-eligible household, rather than forcing them to ration vouchers through long waitlists and randomized lotteries, a universal program would deemphasize poverty governance in the selection process. But for this type of program to succeed, PHAs require additional resources to support renters with the greatest housing needs. These resources must focus on improved search assistance, stronger mobility counseling, and extended search periods to overcome the barriers to securing a housing unit. Such resources will lessen the burdens on PHAs to weed out undisciplined clients and punish those deemed incapable of abiding by market norms, but they will not eliminate these practices altogether. Any type of market-based solution will continue to require the punitive hand of the state to promote market discipline.

Creating a housing ecosystem that guarantees affordable housing without relying on practices of poverty governance demands a deeper reconsideration of market fundamentalism in housing policy. Only through a commitment to social housing can PHAs lessen their reliance on the private rental market and eliminate the disciplinary hand of the state. This type of agenda prioritizes the construction and rehabilitation of non-market housing units, including the reinvestment in public housing (Cohen 2019; Day 2019). It demands a decommodification of housing for the most vulnerable renters to ensure their housing needs are not subject to evaluations of their market readiness or discipline. It requires a more accessible safety net to support struggling renters *before* they experience long-term instability and eviction. A robust housing agenda will include market-oriented programs, like the Housing Choice Voucher program, for those likely to benefit from market-based mobility opportunities, but it also demands an investment in non-market alternatives to assist those at the greatest risk of insecurity. Decoupled from the private market, an inclusive social housing agenda will lessen the burden on housing agencies to enforce market discipline and relieve them of the obligation to focus on those deemed ready to rent.

Acknowledgments

I would like to thank the PHA officials who took time to participate in this research. I am deeply grateful to Kathleen Moore for collaborating on the data collection and sharing her incisive knowledge of the Housing Choice Voucher program. Max Besbris, Ruth Braunstein, Corey Fields, Jennifer Heerwig, Becky Hsu, Yuki Kato, Rahsaan Mahadeo, Kristin Perkins, and Eva Rosen provided valuable comments on earlier drafts of the manuscript. This manuscript benefited enormously from the thoughtful reviews of four anonymous reviewers. I am extremely grateful for their continued engagement with the manuscript. Earlier versions of this paper were presented at the Association for Public Policy Analysis and Management; the American Sociological Association; the Georgetown University Sociology of Housing Conference; the Milano School of Policy, Management and the Environment at the New School; and the Furman Center for Real Estate and Urban Policy at New York University. Research protocol was approved under Georgetown University Institutional Review Board #2018-0050.

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Notes

1. The rate of successful lease-up varies widely across local housing markets. Although PHAs do not always track the share of issued vouchers forfeited, administrative documents from various housing agencies occasionally include this information. In their analysis of the Housing Opportunity Program (HOP), the Tacoma Housing Authority reports that 33 percent of issued vouchers are returned unused (Thompson 2018:16). Reina and Winter (2019) report that slightly less than 50 percent of households living in project-based Section 8 used their vouchers when building contracts expire.
2. Across the United States, 3,803 housing agencies administer HUD programs (U.S. Department of Housing and Urban Development n.d.). Only 2,197 administer vouchers, either exclusively or in combination with public housing. The remaining agencies administer only public housing.
3. Agencies often create preference structures that favor certain types of applicants in the selection process. Common structures include a preference for homeless households, rent-burdened households, and families that live or work in the jurisdiction.
4. Although clients engage as market actors in the search for rental housing, they must abide by certain rules from the housing agency to utilize their voucher. Market rents must fall within payment standards crafted by the housing agency—typically, between 90 and 110 percent of the fair market rent. Units must pass a housing quality inspection conducted by the agency. Clients are typically required to select a unit in the jurisdiction of the housing agency and remain in the jurisdiction for at least one year before using their voucher to move elsewhere.
5. For additional information on the SEMAP program, see https://tinyurl.com/3mtnu3cr.
6. Performance metrics guide agency management in the voucher program, and these types of quantitative metrics are increasingly common in other institutions, too. Petre (2021) and Christin (2020), for example, show how metrics, like clicks on websites and shares on social media, drive the production of content in the news industry.
7. These efforts to incorporate low-income renters as functional market participants contrast with the goals of housing policy for homeowners, which largely center ideas about civic incorporation and the expectations of community-engaged citizenship (McCabe 2016; Taylor 2019).
8. Consistent with the requirements of the IRB, I anonymize the names and locations of participating agencies and officials. Throughout the article, I identify only the agency size or general geographic location in ways that do not compromise the anonymity of the agency.
9. Public housing agency characteristics, including program size and region, are drawn from the 2018 "Picture of Subsidized Households" (U.S. Department of Housing and Urban Development n.d.).
10. The sample selection process occurred in two waves after the pilot interviews. Initially, I selected a set of diverse metropolitan areas and contacted multiple

PHAs within those areas to schedule interviews. This selection process was designed to observe variation in PHA practices while holding metropolitan-level housing conditions (e.g., housing supply, prices) constant. PHA directors occasionally introduced me to their colleagues at other agencies, both within the metropolitan area and across the country, to participate in the research. However, this sampling procedure resulted in the exclusion of the smallest PHAs, many of which are located in rural or non-urban places, and which tend to be less integrated into nationwide networks of PHA administrators. To broaden the sample, I used HUD records to stratify PHAs according to the size of their programs. I randomly selected small- and medium-sized PHAs to contact for telephone interviews. For each selected agency, I sent an initial email to the program contact (obtained either through HUD records or the PHA website) explaining the research project and inviting them to participate in an hour-long interview. All but one interviewee consented to being recorded for the research.

11. In an effort to keep their lists up-to-date, housing agencies regularly purge their waitlists. They typically do so by sending letters to households on the list and removing those that do not respond. Households must *proactively* respond to the letter from the housing agency or risk removal from the waitlist. Similar to the selection process, this purge process disadvantages households with unstable addresses, or those who forget to update their address upon moving (Kim 2022).
12. Depending on the size of the housing agency and the number of vouchers issued, these briefings are usually conducted in groups. However, at smaller agencies, or those issuing vouchers infrequently, the briefing session may be conducted one-on-one with a voucher specialist.
13. HUD mandates a minimum search period of 60 days, but housing agencies have broad discretion to set the initial search period above this floor.
14. This terminology aptly describes the experience of shopping for a rental apartment, but it neglects the structural challenges that clients encounter as they search for housing units. In fact, as Rosen (2014) makes clear, it is often landlords with difficult-to-rent units who "shop" for voucher clients, rather than the reverse.
15. Every housing unit in the Housing Choice Voucher program is required to pass an inspection to ensure the unit is program compliant. As such, agency housing inspectors are regularly in the field inspecting units.
16. https://mayor.dc.gov/release/mayor-bowser-announces-15-million-direct-cash-assistance-program-support-new-and-expectant
17. Housing agencies approach utilization by maximizing either their *unit utilization*, which refers to the number of units leased as a share of the total number of units under the Annual Contributions Contract, or their *budget utilization*, which considers the annual program cost at a housing agency divided by the annual budget authority. In practice, most agencies strive to maximize their budget utilization.

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