Managing Public Housing Authority Policy Change to Lower Barriers for People with Criminal Records

Public Housing Authority Policies and Change Management

Public Housing Authorities (PHAs) have meaningful opportunities to increase access to Housing Choice Vouchers for people directly impacted by the criminal legal system. Doing so may require PHAs to make changes to their policies and practices, a process that should be managed and monitored during implementation.

While the change process initially may be resource-intensive, taking the time to implement change processes effectively avoids challenges down the road, and will ultimately reduce staff time spent on unnecessary review of criminal records unrelated to the new, lower barrier policy.

Focusing on Stakeholders

Stakeholder engagement should begin as early as possible in the change process. Both internal and external stakeholder engagement are critical to implementing sustainable change, but PHA leaders should focus special attention to staff.

PHAs may have inherited a culture where the penalties for innovation outweigh the rewards. Government agencies often face more rules and regulations than the private sector, making change management for PHAs more challenging. At the same time, public entity staff are often mission-driven, which increases employee engagement.

Centering change on the PHA mission statement has the power to reenergize staff, provide housing to more community members, and reach full voucher utilization rates. Discussions about the racial equity impact of criminal records barriers can focus on common PHA values and the role of implicit bias.[1]

Phases of Change

For successful change, PHA leadership should consider the following phases:

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[1] Verywellmind, *How Does Implicit Bias Influence Behavior?* (2023), available at: https://www.verywellmind.com/implicit-bias-overview-4178401; Stanford Social Innovation Review, *Changing the Housing Narrative by Talking About Race and Values* (2022), available at: https://ssir.org/articles/entry/changing_the_housing_narrative_by_talking_about_race_and_values.

1. Defining the change desired.

2. Implementing those changes.

3. Communicating changes to internal and external stakeholders.

4. Clarifying staff roles and responsibilities.

5. Monitoring and evaluating results to ensure sustainable change.

Navigating the phases of change will require attention to both internal and external processes. While this may overlap and intersect, at some points different approaches may be required for staff and the public. The sections below include some initial considerations for PHAs for inner- and outer-facing change management.

Define the change desired.

The first step towards change is to define the parameters by gathering input from stakeholders. Engaging as many people as early as possible and in each phase of the overall process is critical to overcoming later resistance to change.

- Internally: assess current staff opinions, envision potential outcomes of the change, and create a staff team dedicated to managing the effort. Consider circulating draft policies for feedback.

- Externally: establish the need for change by collaborating with community-based organizations and directly impacted people, particularly those with a focus on racial equity.

Implement those changes.

Once the new policy is defined and approved through the PHA Plan process, implement the change through internal PHA procedures. Consider incorporating the following strategies during policy implementation:

- Internally: create protocols to address potentially challenging situations and set aside dedicated space and time to discuss obstacles. Build in positive reinforcement to celebrate successes.

- Externally: remain connected to organizations working with individuals navigating the new process to stay abreast of implementation challenges.

Communicate changes to internal and external stakeholders.

Studies of change in federal government agencies demonstrate that employee acceptance of change is heavily influenced by not only the initial and ongoing engagement of frontline

staff, but also provision of adequate information about the change throughout the process.[2] Misinformation or erroneous policy interpretation left uncorrected can be a source of resistance.

Policy change communications with the public can be developed in collaboration with community stakeholders. Communications for both groups should be both responsive in real time and planned.

- Internally: develop an internal communications road map that clearly states the policy change, any new or modified processes, and clearly delineates opportunities for further staff input.

- Externally: decide who the messengers will be, balancing between PHA leadership to signal the level of commitment and trusted community partners. Obtain consensus on talking points for different audiences and train all messengers on them.

Clarify staff roles and responsibilities.

Change involves letting go of the way things used to be done, a neutral zone of finding clarity, and a new beginning of managing the updated policy or process.[3] Because staff tasks may be changing to accommodate the new policies and procedures, attention should be paid to creating clarity about roles.

- Internally: Tailor training to staff with new tasks related to the policy and offer agency-wide training on the updated policy and processes.

- Externally: identify and share which staff are key to implementing the new lower-barrier policy, and who is the PHA staffer on point for any questions or concerns about the process.

Monitor and evaluate results to ensure sustainable change.

As part of the change process, there should be internal and external agreement on when the PHA has achieved success in implementing the new policy. After establishing a baseline, some metrics could include eliminating denials for applicants with arrest-only criminal history information, reducing denials for non-violent convictions, or increasing mitigating evidence permitted at hearings.

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[2] Wan Narita Mustapha et. al., *Change Management in Public Sector* (2004), available at: https://jas.uitm.edu.my/images/2004_DEC/1.pdf.

[3] Change Management Toolkit: Tips, tools, and techniques for leading a successful change initiative by the University of California Berkeley.

- Internally: review data at regular intervals to identify implementation issues early on and meet with staff frequently to discuss how they can be supported. Be willing to adjust the timeline.

- Externally: meet occasionally with external stakeholders to verify that internal data is matching consumer experiences and obtain feedback on potential policy and procedure revisions.

As the PHA policy changes become the new normal, consider writing up an evaluation or debrief of successes and suggestions for improvements to future processes. The lessons learned from this change management experience will be a valuable resource to future PHA staff and could serve as a guide to agency peers in other states. This could be done from solely the PHA perspective or in partnership with community stakeholders.

Links to Key Resources

- HUD, *Writing Measurable Goals* (2016).

- HUD, *Communications Management Plan PPM Version 2.0* (2014).

- U.S. Office of Personnel Management, *Scenario Based Workforce Planning* (2011).

- U.S. Office of Personnel Management, *Guidance for Change Management in the Federal Workforce: Accelerating the Gears of Transformation* (undated).

- Homebase, *Navigating Housing Choice Voucher Program Applications for People with Criminal Records* (2023).

- Homebase, *The Fair Housing Act and Criminal Background Checks: What Housing Providers and Case Managers Need to Know* (2022).