

Connecting magnet schools and public housing redevelopment: January 2023 update

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PRRAC's March 2021 policy brief, *Mixed income neighborhoods and integrated schools: Linking HUD's Choice Neighborhoods Initiative with the Department of Education's Magnet Schools Assistance Program*, highlighted an important opportunity for interagency collaboration, encouraging an explicit connection between HUD's Choice Neighborhoods Initiative (CNI) and the Department of Education's Magnet Schools Assistance Program (MSAP). As we advocated with both agencies, if funding connecting MSAP and public housing redevelopment were incentivized by both HUD and the Department of Education, applicants could create plans for their communities that include a vision for safe, accessible housing, as well as neighborhoods and schools with diversity of race and income. The purpose of this update is to determine:

a) whether HUD and the Department of Education incorporated any of these recommendations to encourage the connection of MSAP and CNI or other public housing redevelopment projects and b) whether applicants responded to such encouragement.

Did the requirements and incentives of the most recent MSAP application attempt to link MSAP to public housing redevelopment? Did the requirements and incentives of the MSAP application encourage cross-sector collaboration?

In our March 2021 policy brief, PRRAC recommended that the Department of Education "prioritize MSAP grants that will contribute to successful Choice Neighborhoods implementation or other public housing redevelopment." PRRAC also recommended the establishment of public housing redevelopment as an eligible activity in future school integration planning grants. Both recommendations elevate the importance of cross-sector collaboration in addressing issues of housing development and community diversity.

The most recent MSAP application positively addressed these goals. In the MSAP Notice Inviting Applications (NIA) for 2022, the Department of Education explicitly mentions a special interest in applications that connect MSAP proposals to local public housing redevelopment projects. The NIA also specifically highlights the Choice Neighborhoods program as a way to do this. The NIA also sets out two "invitational priorities." These priorities represent areas of importance related to MSAP as defined by the Department of Education. One of those priorities, Coordination Across Agencies and Organizations, promotes partnership across government agencies and community organizations to promote diversity within magnet schools. Here, the Department suggests

^{1.} Philip Tegeler & Laura Gevarter, Mixed income neighborhoods and integrated schools: Linking HUD's Choice Neighborhoods Initiative with the Department of Education's Magnet Schools Assistance Program (PRRAC, 2021), pg. 12.

^{2.} Id at pg. 15.

^{3. 87} Fed. Reg. 9587, 9588 (Feb. 22, 2022)

^{4. 87} Fed. Reg. 9587, 9588 (Feb. 22, 2022)

connecting MSAP and CNI planning, along with collaboration with housing and transportation authorities to achieve diversity goals. Note, however, that as an "invitational" priority (as opposed to a "competitive" priority), this emphasis on interagency coordination did not have any additional competitive points attached.⁶

Did the requirements and incentives of the most recent Choice Neighborhoods Planning and Implementation Grants applications align with our recommendations to link MSAP to public housing redevelopment? Did the requirements and incentives of the CNI Grants applications align with our recommendations encouraging cross-sector collaboration?

PRRAC recommended that HUD "explicitly incentivize interventions that actively promote school integration - especially magnet schools - in Choice Neighborhood Initiative grant applications." HUD has since released two 2022 Notices of Funding Opportunity (NOFO) for the Choice Neighborhoods Initiative.⁸

Unfortunately, HUD does not mention the MSAP program in its CNI Planning Grant application, and there is no reference to school integration. However, the department will award points for applications that demonstrate partnerships between housing and education. ⁹ This means applications with plans that involve local school districts will be incentivized at the Planning Grant stage. Further, the Implementation Grant application awards points to applicants for including an education strategy. ¹⁰ In this context, education strategy within an application will be evaluated "based on the extent to which it demonstrates a well-defined, sound and resultsoriented strategy to achieve the priority Education outcomes." While not directly aligned with the recommendations made by PRRAC in 2021, these are broad incentives that could be leveraged to support more diverse schools and neighborhoods.

Did the applications for districts awarded MSAP funding reflect an effort to link MSAP to CNI and/or public housing redevelopment? Did these applications reflect an incentivization of cross-sector collaboration?

Surprisingly, despite the language in the 2022 NIA from the Department of Education, none of the applications that received MSAP funding for 2022 made any mention of public housing redevelopment or Choice Neighborhoods. This suggests a need for greater organizing and publicizing this opportunity prior to the next funding round, and also a need to strengthen the priority by making it a competitive priority with points attached to encourage responsive applications. 12

6. Cf 34 CFR §75.105(c)(1) vs 34 CFR §75.105(c)(2)(i).

https://www.hud.gov/program offices/spm/gmomgmt/grantsinfo/fundingopps/fy22 choice.

^{5. 87} Fed. Reg. 9587, 9589 (Feb. 22, 2022)

^{7.} Mixed income neighborhoods and integrated schools,, pg. 13.

^{8.} FY22 Choice Neighborhoods Planning Grants Notice of Funding Opportunity, FR-6600-N-38, https://www.hud.gov/program offices/spm/gmomgmt/grantsinfo/fundingopps/fy22 choice neighborhood;FY22 Choice Neighborhoods Implementation Grants Notice of Funding Opportunity, FR-6600-N-34,

^{9.} FY22 Choice Neighborhoods Planning Grants Notice of Funding Opportunity, FR-6600-N-38, pg.47, 49 10. FY22 Choice Neighborhoods Implementation Grants Notice of Funding Opportunity, FR-6600-N-34, pg. 82.

^{11.} FY22 Choice Neighborhoods Implementation Grants Notice of Funding Opportunity, FR-6600-N-34, pg. 83.

^{12.} Adding a competitive priority for cross-agency coordination with HUD on public housing redevelopment would be consistent with Secretary Cardona's "Final Priorities and Definitions-Secretary's Supplemental Priorities and Definitions for Discretionary Grants Programs," 86 Fed. Reg. 70612 (December 10, 2021), which includes a priority for "Strengthening Cross-Agency Coordination." https://www.federalregister.gov/documents/2021/12/10/2021-26615/final-priorities-and-definitions-secretarys-supplemental-priorities-and-definitions-for

Districts that did include some general reference to cross-sector collaboration mainly focused on existing partnerships between school systems and local agencies to improve transportation, access to extracurricular programming, and access to mental health supports. Brooklyn, NY and Queens NY, along with Clayton County, GA mentioned collaboration with local housing authorities, however these partnerships were not focused on public housing redevelopment efforts.

Did the applications submitted for Choice Neighborhoods funding reflect an effort to link MSAP and public housing redevelopment? Did these reflect an incentivization of cross-sector collaboration?

Application information for 2022 CNI grantees is not available on the HUD website, but HUD has made project summaries available for the 2021 planning grant awardees. While some of the project summaries mention partnership and cross-sector collaboration, none mention magnet schools or describe what (if any) substantial efforts will be made to incorporate schools into these neighborhood redevelopment plans.

Conclusion

The 2022 MSAP grant process at the Department of Education, with its positive invitational priority relating to public housing redevelopment – yet no responsive applications – suggests a need for more effective messaging in the magnet school community about the value of collaborating with public housing authorities, and also the need to elevate the invitational priority to a "competitive" priority to encourage more applications.

At HUD, the apparent lack of attention to magnet schools or school integration among grantees for the Choice Neighborhoods program is traceable to the absence of any priorities or incentives in the NOFA. HUD took an important first step by including a competitive priority for collaboration with local school districts, but in the next funding round, HUD should seriously consider encouraging its applicants to specifically coordinate with magnet school and MSAP grantees, and to require analysis of school integration impacts of CNI proposals, consistent with the obligation of HUD and its grantees to affirmatively further fair housing.