Learning from the "Vienna Model" of Social Housing

Policy Tourism, Model Assemblages, and the Tensions of Counter-Neoliberal Policy Mobility in the United States



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Abstract

There is a large "policy movement" literature exploring why and how policy moves from one time and place to another. Policy mobility scholars focus on how power mediates the spread of policy knowledge and the multi-scalar process of mutation as policies lands in new contexts. Across research traditions, few scholars engage with cases of policy movement in a counter-neoliberal direction, with many arguing that policy movement typically does not disrupt existing unequal power structures. My thesis addresses this research gap by studying how left-leaning housing policymakers and activists in the U.S. are looking toward international models of non-market housing—specifically, the "Vienna Model" of social housing—to address the U.S. affordable housing crisis. In this policy discourse, the "Vienna Model" of social housing is upheld as an international exemplar, applauded in journalistic articles, academic papers, and policy reports for its low rents, high-quality architecture, and resident social mix. This thesis seeks to understand the dynamics influencing the assembly of an abstracted Vienna Model by housing actors in Vienna and the U.S.; the process by which the Vienna Model is mobilized and spread in U.S. housing circles; and attempts to reassemble the Vienna Model in two U.S. cities through the creation of new housing institutions. I find cleavages arise among ideologically mixed coalitions advocating for "social housing" as details and definitions—rent levels, income limits, ownership structures, and funding sources—are debated. These tensions are heightened due to the substantial policy mutation that occurs, given the large differences between the Viennese and U.S. housing systems and welfare regimes.

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1. Introduction

There is a large "policy movement" literature exploring why and how policy moves from one time and place to another. Policy diffusion scholars seek to understand causal patterns in the dissemination of policy innovations. Policy transfer scholars study the causes of policy regime change and evaluate the "success" or "failure" of policy transfer. In contrast, policy mobility scholars focus on how power mediates the production and spread of policy knowledge and the multi-scalar process of mutation as policy travels.

Across research traditions, few scholars engage with cases of policy movement in a counterneoliberal direction, with many arguing that policy movement typically does not disrupt existing unequal power structures (Peck & Theodore, 2010; Soaita et al., 2023). Similarly, within the topic of housing, less attention is paid to cases where policy movement is attempted between different welfare and housing regimes in a decommodifying direction—such as exchange from social democratic, universalist regimes to liberal, residualist regimes (Esping-Andersen, 1990; Kemeny, 2001). Instead, the international expansion of neoliberalism via policy movement has been "particularly common" focus in the literature (Soaita et al., 2023, p. 112), with various authors foregrounding marketization in their work (Peck & Theodore, 2015; Blessing, 2016; Larner & Laurie, 2010). While the spread of neoliberalism is an important area of focus for housing policy movement research, there is a research gap in studies examining how housing actors take inspiration from housing approaches elsewhere to challenge neoliberal housing ideologies and policies at home.

My thesis will address this research gap by studying how left-leaning housing policymakers and activists in the U.S. are looking towards international models of non-market housing specifically the "Vienna Model" of social housing—to address the U.S. affordable housing crisis. In this policy discourse, the "Vienna Model" of social housing is upheld as an international exemplar, applauded in journalistic articles (Dreier, 2018; Mari, 2023; Oltermann, 2024); academic literature (Koželouhová, 2014; Matznetter, 2020; Vergara-Perucich, 2025); and leftist books (Madden & Marcuse, 2016) for its non-market housing with low rents, high-quality design, and socially mixed developments. A growing number of U.S. housing actors have visited Vienna to learn about the city's housing system on study delegations with specifically designed social housing curriculums (Lang, 2024; Lee & Chang, 2023), and Vienna's housing system is commonly referenced as a case study in U.S. social housing policy proposals (Gowan & Cooper, 2018; Amee Chew, 2022; Rosales et al., 2025). A variety of actors (City of Vienna officials, Austrian housing experts, international consultants, and delegation organizers) are involved in assembling the "Vienna Model" as a policy knowledge object, and significant abstractions must be made for it to smoothly circulate in international and U.S. policy networks.

The research will analyze how knowledge about the "Vienna Model" is assembled and communicated by professionalized housing experts based in Vienna and the U.S.; examine

the way policy knowledge is disseminated to and received by U.S. housing actors through media, policy reports, and study delegations; and survey the political process, institutional forms, and policy logics of the resulting new social housing entities that have been created in two U.S. cities. This thesis looks to understand the dynamics influencing the *assembly* of the Vienna Model, its *mobilization* to the U.S., and attempts to *reassemble* the Vienna Model in new cities, by interviewing both Vienna-based housing actors focused on education and American housing actors who are working to pass and implement "social housing" in the U.S. context. Vienna is just one prominent international model in this policy space, and the term "social housing" in the U.S. context—which only recently has grown in usage to communicate a new housing policy model—has substantial conceptual ambiguity and definitional disagreement. I will undertake this project through the thematic analysis of multiple sources to unpack the successes, tensions, and contradictions that arise from attempts to transfer components of the social democratic Vienna Model into the highly commodified U.S. housing system.

In reality, few policy ideas can be traced back to a singular origin point. Policymakers and activists alike draw on multiple sources of inspiration. Furthermore, it is difficult for one to fully discern (even for the actors themselves) the degree of influence that different local or international sources play in policy idea formation. Even the categorization of "local" and "international" policy ideas is prone to destabilization upon closer inspection (Robinson, 2015), which I will touch on when discussing the domestic "Montgomery County Model" of public development. By foregrounding an exploration of how the "Vienna Model" has been mobilized in U.S. housing policy, this thesis may well appear to overstate its influence. This is not the goal. Instead, the desire is to closely study *one* source of inspiration for alternative housing approaches in the United States.

I argue there are multiple conceptions of an abstracted, reified "Vienna Model," with some discourses emphasizing the radical Red Vienna period and others foregrounding contemporary housing strategies. Historical context is important to take into account, considering the prior attempts to mobilize European non-market housing models to America during the 1930s; parallels contemporary American actors are making as well (Daniel Denvir, 2023). The concept of "social housing" takes on multiple meanings when mobilized in the U.S., and these different conceptions are embedded in distinct political agendas. For some, the policy instruments of social housing are framed as a new tool in the toolbox to innovatively finance and expand housing supply; "a complement, not a competitor to existing affordable housing production" (Center for Public Enterprise, 2024). Many of these "public development" actors avoiding using the term "social housing" all together. For others, the project of social housing in America is much more ambitious, serving as a conceptual entry point to begin reimagining the American welfare state and recasting housing as a public good rather than a commodity (Rosales et al., 2025). In addition to a review of the national social housing landscape, I will also provide a preliminary analysis of specific local social housing efforts in Chicago and Seattle.

I find cleavages among ideologically mixed coalitions advocating for "social housing" as details—like rent levels, income limits, ownership structures, and funding sources—are debated. Tensions are heightened due to the substantial policy mutation that occurs, given the large differences between the Vienna and U.S. housing systems and welfare regimes. In conclusion, by studying the processes by which the "Vienna Model" of social housing is circulating in the U.S., this thesis contributes to the literature by examining the complexities of counter-neoliberal housing policy mobilization and documenting new directions in U.S. housing policy. Expanding the literature on how alternative policy models travel by investigating attempts to shift local housing regimes towards decommodification.

2. Literature Review and Theoretical Framework

2.1. What is Social Housing?

2.1.1. Defining Social Housing: A Floating Signifier?

"Social housing" is a highly varied and frequently debated term in the academic literature. In the European context, scholars have observed that "no attempt to find a common definition has received general approval in a wider housing community. Instead, there is a multitude of various definitions and descriptions" (Granath Hansson & Lundgren, 2019, p. 153). This conclusion has been reached in policy circles as well. A 2013 report commissioned by the European Parliament noted, "there is no common official definition for the term 'social housing' across Europe, and not all 27-EU member states even use this term as exemplified [by the fact]: Austria uses the terms 'Limited-Profit Housing' or 'People's Housing'; ... and Sweden [uses] 'Public Utility Housing'" (Braga et al., 2013, p. 9). Yet, this does not prevent social housing from being operationalized as if it has a self-evident meaning, to the concern of those seeking greater analytical sophistication in frameworks for comparing housing systems (Ambrose, 1991, p. 92).

Despite these difficulties, numerous definitions have been attempted.¹ The authors of the text *Social Housing in Europe* define social housing as a housing tenure that "may be based on rent levels (social rents are below market rents), ownership (social dwellings are owned by particular types of landlords), or the existence of a government subsidy or allocation rules (social dwellings are assigned to households via an administrative procedure rather than the market)" (Scanlon et al., 2014, p. 3). Hansson and Lundgren (2019) examined several definitions of social housing in Europe, identified five key criteria, and evaluated which definitions incorporate which criteria; the criteria were target group, form of tenure, type of

¹ Due to the limited scope of this thesis, many of the definitions reviewed are rooted in the European context. Given the breath of scholarship on social housing in the majority of the world (Latin America, Africa, and Asia), future work would benefit from putting European definitions into broader global conversation (Scheba et al., 2021; Valença & Bonates, 2010; Zadeh et al., 2021).

provider, public intervention, and subsidies (See Error! Reference source not found.). While s ocial housing is sometimes assumed to be rental housing, some definitions include other forms of tenure, such as owner-occupied housing or cooperative housing. Furthermore, authors argue that a range of actors can provision social housing, whether public, non-profit, or private. After whittling down the criteria, Hansson and Lundgren (2019) proposed the definition "x is social housing if and only if x is a system providing long-term housing to a group of households specified only by their limited financial resources, by means of a distribution system and subsidies" (p. 162). Importantly, this notion of social housing that necessitates "limited financial resources" contrasts with models of social housing with high-income limits and a universalist orientation.

In his history of social housing in Western countries, *The People's Home? Social Rented Housing in Europe & America*, Harloe (1995) acknowledges the multiplicity of forms and structures of provision of social housing, yet distinguishes "social rented housing" from other forms of housing based on three main attributes: 1) It is provided by landlords at a price which is not principally due to profit considerations (usually below market but not always); 2) It is administratively allocated according to some conception of "need;" and 3) Political decision making has a particularly important influence on the quantity, quality, and terms of provision of social rented housing (p. 13).

Table 2. The presence of key criteria in the sources.

Source	Target group	Tenure	Type of provider	Subsidies	Public intervention
Cambridge Dictionary	Х	Х	X		
Oxford Dictionaries	Χ		X		
Wikipedia	X	Χ	X		
The Construction Industry	X	X	X	X	
Social Housing in the EU	X				X
(Braga and Palvarini)					
Housing Europe	X	Χ			X
Social Housing in Europe	X	Χ	X	X	
(Scanlon et al.)					
Bengtsson, B.	X				
Blessing, A.	X	X	X	X	X
Haffner et al.	Χ				
Haffner & Oxley	X			X	
Oxley et al.	Χ				X
Oyebanji	X		X	X	X
Malpass & Victory	X	Х	X		
Priemus, Hugo	X	X			X
Yates, J.	X	Х		X	

Figure 1: Key criteria in social housing definitions. (Granath Hansson & Lundgren, 2019, p. 157)

A similar semantic ambiguity can also be found concerning the social housing that has been termed "public housing" in the United States.² As has been noted, "over time, the initial idea

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² Given these academic definitions, one might assume American subsidized housing targeted to low-income populations, like public housing, would be understood as social housing. Nevertheless, the term social housing is infrequently used in the United States mainstream, and some housing actors have actively framed the term

behind conventional public housing (i.e., housing financed, owned, and operated by the public sector) has undergone so many changes that it makes increasingly little sense to describe all of it with the same name" (Vale & Freemark, 2012, p. 379). Even looser concepts such as "affordable housing" in the United States have mutated over time. After assessing it had attracted negative stigma, some policymakers and advocates even considered abandoning the term "affordable housing" (Goetz, 2008). The diversity of social housing definitions and structures reflects differences in countries' social welfare regimes, differences that manifest across dimensions of housing tenures, the provider of the social housing, beneficiaries, and funding arrangements. These definitional nuances are important to consider when examining how social housing is conceived of in the United States context.

2.1.2. Welfare and Housing Regimes

Comparative scholars in housing have developed a variety of typologies and ideal types to help comprehend variegated institutional arrangements and enable cross-country comparison. One of the more prominent theorizations of national housing systems in industrialized countries is the housing regime theory developed by Jim Kemeny (Kemeny, 1981, 1995). Kemeny was influenced by concepts in the comparative welfare state literature and sought to theorize how and why different welfare states produce different housing systems (Blackwell & Kohl, 2019). The use of "regime" was intentional as it goes beyond a policy typology. Instead, a "regime is a concept that cuts across different social policies and also involves aspects of society other than just social policy: the organisation of labour markets, cultural matters such as gender roles, and matters of political power relations and ideology" (Ruonavaara, 2020, p. 6).

Welfare regime concept

In particular, Kemeny (2001) worked with Epsing-Andersen's (1990) "three worlds of capitalism typology," which was motivated by a class theory of power and did not merely aim to provide a descriptive analysis of welfare systems. The typology identified three welfare regimes: "social democratic, corporatist and liberal ... [that] in turn, generate welfare systems that can be called decommodified, conservative and residual, respectively" (Kemeny, 2001, pp. 58–59). Each regime has a different balance of class power: social democratic welfare regimes are created by working-class movements successfully making alliances to isolate conservative forces; corporatist regimes are the result of a deadlocked power system and feature political horse-trading; and the liberal regime is dominated by conservative forces with a marginalized working class. The welfare systems that result from

much narrower to define a specific housing politics and policy logic, one that sometimes (but not always) excludes the U.S. public housing program and most other existing affordable housing programs.

each welfare regime are a result of the upstream relative power balance between classes, which determines the degree of decommodification pursued.³

The following briefly describes each welfare regime ideal type. The liberal welfare state strictly targets those assessed to be "in need," and these means-tested (typically modest) welfare benefits are predominantly delivered through market mechanisms. The narrow focus of the liberal welfare state on a restricted segment of society is why its outcomes are called residualist. In contrast, the social democratic welfare state provides universalistic social benefits to the entire population with few restrictions. Welfare provisioning does not follow market principles; with its focus on delivering decommodifed goods and services, the social services are high quality yet also require high taxes and large budget outlays. Lastly, the conservative-corporatist welfare state is neither residualist nor universalistic in orientation. Instead, it supplies welfare goods to most of the population, graded by class, status, and gender; this regime often tends to rely on care provided by women within the family (Matznetter & Mundt, 2012, pp. 274–275).

An important feature of the welfare regime formulation is its strong emphasis on structure and stability. This can also be understood through the language of path dependency, that is, "crucial past decisions decisively curtail the options for future development" (Matznetter & Mundt, 2012, p. 277). Some scholars have critiqued Epsing-Andersen's position as an excessively strong version of path dependency driven by a focus on the "Golden Age" of welfare states in the 1970s (Blackwell & Kohl, 2019; Matznetter & Mundt, 2012). This critique is situated amongst broader debates in comparative housing studies concerning different schools and traditions of analysis, such as convergence and divergence perspectives (Kemeny & Lowe, 1998). While housing typologies and ideal types can help one better comprehend the social world, scholars caution against these categories becoming reified and deployed in a mechanical, unreflexive manner (Blackwell & Kohl, 2019, p. 313). As Kemeny notes in a critique of the development of typologies in comparative housing and welfare research, "the critical task is therefore not to *describe* typologies but to *explain* them." (Kemeny, 2001, p. 58, emphasis in original).

Housing regime concept

Notably for housing researchers, Esping-Andersen's welfare regime framework excluded housing from its analysis. For Kemeny, housing is a unique pillar of the welfare state and is distinguished from the other three pillars—namely social security, health, and education—by its relatively high capital intensity compared to other welfare pillars and more limited public sector provision (Kemeny, 2001). While safe, decent housing is often considered a universal human right, much of it is privately provided (though often subsidized by the state), and thus it holds an ambiguous position in the welfare state. Kemeny quotes

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³ The typology has been critiqued for its lack of attention to the micro-level, especially a gender and household perspective on the manifestation of the welfare state. This is a critique that Epsing-Andersen accepted in later publications (Matznetter & Mundt, 2012, p. 276).

Torgersen (1987), who referred to housing as "the wobbly pillar of the welfare state" (Kemeny, 2001, p. 55; Torgersen, 1987). Nevertheless, Kemeny (2005) and other scholars note that it is important to consider housing policy within the broader context of a given welfare state (pp. 74–75). Housing policy is rarely pursued as policy alone but instead "has been used as an economic policy to smooth business cycles, maintain employment and reduce labour costs," alongside other implicit goals (Matznetter, 2002, p. 267).

Though influenced by the welfare regimes approach, Kemeny proposed a new housing typology which emphasized tenure and distinguished between two types of rental markets: unitary and dualist. A "unitary rental market," such as those found in some central European and Scandinavian countries, specifies a rental market structure where the non-profit/public rental sector competes directly with the private rental sector on an equalized basis (Blackwell & Kohl, 2019; Kemeny, 2001). This contrasts with "dualist rental systems"—such as those found in the United Kingdom and the United States—in which the public sector targets highly-regulated housing to a subset of "need-based" tenants, while the private sector proceeds on market terms.⁴ Though by 2001, Kemeny was keen to observe that "there are signs that the distinction between these two [rental systems] is becoming increasingly blurred" by marketization (Kemeny, 2001, p. 67).

According to some housing scholars, the degree of homeownership in a society is (or was) a key driver of the constitution of the welfare state (Francis Castles, 1998; Kemeny, 1981, 2005). In 1981, Kemeny originally argued that high degrees of homeownership reduced the likelihood of welfare state formation as high homeownership costs led to less support for the high taxes needed to fund a welfare state. This thesis was modified in later years amidst critiques of the causal direction of this relationship (Francis Castles, 1998). In 2005, Kemeny proposed that countries with unitary housing regimes that began to experience welfare state cutbacks would subsequently see shifts towards homeownership (Blackwell & Kohl, 2019; Kemeny, 2005). Kemeny also argued that the lack of alternative options for middle-income households in countries with dualist rental systems (ineligibility for public sector rentals and high-cost, insecure private rentals) led to high rates of homeownership. Some recent housing scholarship has raised questions of the continued strength of this relationship, describing it as a more accurate snapshot of the early post-World War 2 period, but finding "fading evidence for the much-vaunted welfare-homeownership tradeoff when adopting the long-run view" of the 1990s and onwards (Blackwell & Kohl, 2019, p. 313).

Scale in housing and welfare regimes

Much of the literature in comparative housing studies and the welfare regime literature takes as given the nation-state as the key unit of analysis (Matznetter & Mundt, 2012). This is partially driven by the fact that much of the relevant data is collected at the national level,

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⁴ Dualist rental systems have also been called "residualist", as the state only intervenes to support the remaining portion of the population that cannot be served by the private housing market.

as are the outcome variables of interest, even as welfare regimes in practice are increasingly devolved to subnational and regional levels. This tends to be the case for the welfare regime framework as well. Even analyses of countries in the conservative-corporatist welfare regime—with their notable degree of fragmentation and decentralization—are still conducted with average values and nationwide figures. As Matznetter and Mundt (2012) note, "from the viewpoint of housing research, and social housing in particular, the debate on the 'rescaling of statehood' and the critique of 'methodological nationalism' (Brenner, 2004: 38) seems to be very pertinent, but rarely debated in the welfare regime and housing literature" (p. 287). In a similar vein, while acknowledging local housing responses are constrained by international forces and national housing/welfare regimes, Hoekstra (2020) encourages international comparative housing researchers to supplement the dominant focus on the national with an analysis of local and regional housing regimes.

Additionally, this subnational scale is not new for housing policy, as many European countries in the past have had an experimental housing policy with government involvement centered on the local and regional (where grassroots demands were more salient)—before housing policy was nationalized and incorporated into the welfare state (Matznetter & Mundt, 2012). Just as with national welfare regimes, these subnational pathways into early social housing, non-profit entities, cooperatives, and government agencies can still be observed in local housing systems today (Matznetter, 2020; Matznetter & Mundt, 2012). Path dependency and the incremental nature of change in conservative-corporatist welfare regimes are proposed explanations for the longevity of subnational unitary housing regimes, such as in Vienna, where:

"regulations and institutions that were built up over decades, in lengthy debates and compromises between capital, labour, environmentalists, and others, are more resilient to sudden change, it seems, than more master-minded welfare programmes that can be terminated by temporary majorities anytime." (Matznetter, 2020, p. 565)

2.2. Conceptualizing Policy Movement and Policy Models

2.2.1. Policy Diffusion, Policy Transfer, and Policy Mobility

Concepts of policy movement: Policy Diffusion, Policy Transfer, and Policy Mobility

There is a large multi-disciplinary literature exploring why and how policy moves from one time and place to another. This engagement across disciplines—including political science, geography, sociology, and anthropology—has led to the proliferation of concepts, such as policy diffusion, policy transfer, lesson-drawing, fast-policy, policy mobility, and policy tourism (Soaita et al., 2023). The topics discussed in the broader "policy movement" literature cover substantial ground, with scholars studying urban redevelopment policies (McCann, 2011; K. Ward, 2006), privatization of utilities (Larner & Laurie, 2010), transportation planning (Marsden & Stead, 2011), housing (Soaita et al., 2023) and more.

The extensive policy movement literature can be categorized into three main research veins: policy diffusion, policy transfer, and policy mobility (Haupt, 2023; Pojani, 2020; Soaita et al., 2023). This review will cover these three main research veins and put them in conversation with each other, with greater emphasis on the policy mobility approach.

Policy Diffusion

Policy diffusion is the oldest of these research traditions, emerging in the 1960s in the context of American comparative state politics researchers studying the dissemination of policy innovations between American states (Haupt, 2023). This state-level focus has since been expanded by other scholars to include diffusion between nation-states or cities within a country. One definition of policy diffusion found in the literature conceptualizes it as "a process through which policy choices in one country affect those made in a second country," with the specific object of interest being "a process of interdependent policy convergence" (Marsh & Sharman, 2009, pp. 270–271). The policy diffusion literature tends to focus on structural explanations of policy movement and seeks patterns in the spread of policy. Diffusion patterns include communication across national networks; geographical proximity, "laggards" learning from "pioneers;" and national governments exerting top-down influence (Marsh & Sharman, 2009; Stone, 2012). The diffusion literature has been criticized for "neglecting the political dynamics involved with transfer" and a preoccupation with "the condition of transfer rather than the content of new policies" (D. Dolowitz & Marsh, 1996; Stone, 2012, p. 547). This critique was one of the factors motivating the development of the lesson drawing and policy transfer research traditions.

Policy Transfer

As mentioned above, the policy transfer literature was spurred in part by critiques of the policy diffusion literature and emerged in the mid-1990s, primarily originating in the United Kingdom. In an influential paper, the political scientists Dolowitz and Marsh (1996) defined policy transfer as "a process in which knowledge about policies, administrative arrangements, institutions etc. in one time and/or place is used in the development of policies, administrative arrangements and institutions in another time and/or place" (p. 344). Though there are some distinctions in terminology and focus, policy transfer is closely related to the "lesson drawing" approach (Robertson, 1991; Rose, 1991). In the beginning, policy transfer focused primarily on knowledge exchange across nation-states, though this scope has since widened to other locales and scales, including the regional and local (Haupt, 2023). To the question of "What is transferred?", Dolowitz and Marsh identify a wide array of objects of policy transfer: policy goals, content, instruments, programs, institutions; ideologies, ideas, and attitudes; and negative lessons (D. Dolowitz & Marsh, 1996; D. P. Dolowitz & Marsh, 2000, p. 12). Policy transfer scholars also note that policymakers pick and choose what to borrow from other contexts and observe study delegations as a mechanism of selective policy transfer. For example, in the 1980s, "other governments sent delegations

to Britain to learn about both the details of the privatization programme and the ideology underpinning" (D. Dolowitz & Marsh, 1996, p. 350)

Policy transfer research has been deemed "practical," given its orientation towards questions of effectiveness and policy outcomes lends itself more to public policy practitioners (Haupt, 2023). Some concern for power relations (though much less than in policy mobilities) is also evident in the literature, regarding whether policy transfer is "voluntary" or "coercive" (D. Dolowitz & Marsh, 1996). Some scholars also emphasize the role of global public policy networks in transnational policy transfer (Stone, 2004). Questions that tend to motivate policy transfer analysis are: who transfers policy; why does policy transfer occur; what is transferred and does this differ in degree; where does transfer occur; what factors allow or constrain transfer; how is the process of policy transfer related to policy "success" or policy "failure;" and how should policy transfer occur (D. P. Dolowitz & Marsh, 2000; Evans, 2009). In later work, the authors reflected on earlier superficial engagement with the question of "Success for whom?" (D. P. Dolowitz & Marsh, 2012; Marsh & McConnel, 2010).

Three factors are put forward to explain why policy transfer ends in policy failure: 1) uninformed transfer is when the borrowing country has insufficient information about how the policy/institution operated in the origin context; 2) incomplete transfer is when transfer occurred but crucial elements that made the policy successful were not transferred; 3) inappropriate transfer is insufficient attention is paid to the differences in economic, social, political and ideological contexts between countries (D. P. Dolowitz & Marsh, 2000, p. 17). Dolowitz and Marsh caution that policy transfer is just one factor and unlikely to be the sole explanatory variable of most policy development. Nevertheless, some political scientists have critiqued policy transfer researchers for using an overly broad definition that subsumes a range of diverse and conflicting theories under an umbrella framework and argue "researchers may be better off using alternative theories focusing more directly on the effects of learning processes or styles of policy-making on policy outcomes" (James & Lodge, 2003, p. 190).

Policy Mobility

The policy mobility literature was inspired by the policy transfer literature, yet the starting point of theorization is often a critique of the policy transfer concept (and to a lesser extent, policy diffusion) (Haupt, 2023; Soaita et al., 2023). Policy mobility scholars critique policy transfer research for an overemphasis on descriptive typologies of transfer agents and the reification of these categories; a nation-stated centered research focus and the omission of urban policy actors; the tendency to assume policies are imported fully formed; a lack of

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⁵ Examples of coercive policy transfer include: the World Bank or International Monetary Fund imposing policy programs on low-income countries as a condition of granting loans; transnational corporations demanding certain policy concessions in exchange for investing in a given country; and more indirect coercive channels, such as countries responding to the regulatory changes of a major trading partner.

attention to policy failure (termed "policy immobilities"); and the positivist approach of conceptualizing transfer agents as engaging in rational, evidence-based policymaking (Haupt, 2023; McCann, 2011; McCann & Ward, 2013; Temenos & McCann, 2013).

Clear definitions are harder to come by in this tradition, which actively avoids "reification." McCann (2013) defines policy mobilities as "the sociospatially produced and power-laden inter-scalar process of circulating, mediating, (re)molding, and operationalizing policies, policy models, and policy knowledge" (p. 6). The policy mobility space takes an interdisciplinary approach rooted in the neo-Marxian political economy tradition, but also draws upon post-structuralism and post-colonialism (McCann & Ward, 2013; Peck & Theodore, 2010). As the geographers McCann and Ward (2013) note, scholars of policy mobility "focus on social construction, relationality, representation, assemblage, practice at the micro-level and politics (broadly defined)" (p. 6). Key terminology and concepts include policy assemblages, mobilities, and mutations. The term "assemblage" connotes how "policies are not internally coherent, stable 'things'" and are instead socially constructed in a multi-scalar manner (McCann & Ward, 2013, p. 8). "Mobilities" is used to show how policy movement is a "complex and power-laden process, rather than a straightforward A-to-B movement" (McCann & Ward, 2012, p. 328). "Mutation" is deployed to underscore how "policy" itself morphs and changes along the way as it travels to a new locale. The representative elements across the policy diffusion, policy transfer, and policy mobility literatures are summarized in Error! Reference source not found..

	Policy Diffusion	Policy Transfer	Policy Mobility
Definition	The spread of [policy] innovations from one government to another" (Shipan & Volden, 2008, p. 841)	"A process in which knowledge about policies, administrative arrangements, institutions etc. in one time and/or place is used in the development of policies, administrative arrangements and institutions in another time and/or place" (D. Dolowitz & Marsh, 1996, p. 344)	"The sociospatially produced and power-laden interscalar process of circulating, mediating, (re)molding, and operationalizing policies, policy models, and policy knowledge" (McCann, 2013, p. 6)
Primary discipline	Political Science, Public Policy	Political Science, Public Policy	Urban Geography, Urban Studies
Ontological assumptions	Realism	Realism/Soft Social Constructivism	Social Constructivism
Epistemological assumptions	Positivism	Positivism	Interpretivism
Objects of study	Focuses on structural explanations of policy movement and identifying patterns in the spread of policy	Policy-(regime) change; 'success' or 'failure' of policies to transfer/lessons to be learned; potential for transferability; and the role of "transfer agents" and institutional actors that are seen as drivers of change	How policy movement shapes and is shaped via global-relational/territorial tensions; how policy is always situated and uneven; how it is tied to immobilities; why policies move or do not; how policy mutates and is reassembled; implications for places, power relations, and lived realities
Actors who move policy	Less focus on agents and more on structural components and variables (e.g., population, geographic proximity, form of government, participation in policy networks)	Elected officials, political parties, bureaucrats/civil servants, pressure groups, policy entrepreneurs and experts, transnational corporations, think tanks, supra-national governmental and nongovernmental institutions, and consultants	Local policy actors (policy professionals within the state, private policy consultants, civil society groups); the global policy consultocracy (incoming policy consultants, outgoing policy consultants); and informational infrastructures (educators/trainers, professional organizations/supralocal policy organizations, popular media)
Methods	Often, quantitative analysis of many cases is used to draw causal conclusions	Interviews with decision-makers, survey data, document review, ethnography, and historical archive research	Standard case study methods – interviews, discourse and document analysis, participant observation, direct observation, and ethnography. Additionally, extended/distended cases- multi-sited or networked qualitative analysis

Table 1- Comparison of Policy Diffusion, Policy Transfer, and Policy Mobility Concepts

McCann (2011) identifies three types of actors that mobilize policy: local policy actors, the "global policy consultocracy," and informational infrastructures. Focusing on defining the latter two, the global consultocracy includes individuals, firms, and think tanks, with a distinction between "incoming policy consultants" and "outgoing policy consultants" (p. 114). Informational infrastructures refer to the "individuals, institutions, organizations, and technologies that interpret, frame, package, and represent information about best policy practices, successful cities, and cutting-edge ideas" (McCann, 2011, p. 114). This includes educators and trainers, professional and supralocal organizations, and the media.

Policy tourism as a mechanism for policy mobility

Academics in the policy movement literature, especially policy mobility scholars, have highlighted the role that travel, conference attendance, and fact-finding trips play in policy knowledge circulation (González, 2011; McCann, 2011; K. Ward, 2006). González (2011) introduced the term "urban policy tourism" to describe "short fact-finding trips by urban and planning professionals to other cities to learn about their transformation" (p. 2). Ward (2011) describes policy tourism as a mechanism of Harvey's (1989) concept of urban entrepreneurialism, and distinguishes between two types of policy tourism: event-led policy tourism (a city assembles policy actors for an event to learn from one another) and visit-led policy tourism (groups of policy actors visit and tour a city renowned for its successful approaches).

Policy tourists, like leisure tourists, come to a place with preexisting expectations and are often shown a curated itinerary of a city to validate those assumptions. In both forms of tourism, tour guides play an important role in selecting what sites and pieces of knowledge to emphasize or downplay. An important implication of the curated study visit is that it may be misleading, especially as guides often exclude critical perspectives. Many urban policy tourism participants readily acknowledge significant barriers to policy learning. Besides the typical justifications of policy learning, González (2011) suggests travel visits provide reassurance and legitimacy to the urban policies that politicians and city officials want to or have enacted in the past.

When does policy move, and is it system maintaining or system challenging?

As Soaita et al. (2023) note, papers examining housing policy movement "tend to argue that policy movement rarely, if ever, disrupt[s] the existing very unequal structures of power, resources and knowledge" (p. 117). Rather, policy movement is more likely if there is an ideological match between the exporting and importing locales. Ward (2006) discusses this tendency when researching how New York City's business improvement districts were introduced to cities and towns in the United Kingdom (K. Ward, 2006). Certain cities become a "most favored city" in policy circles, leading the city's policies to be more likely to travel and find

a receptive "local" audience. Housing policy movement is also mentioned as more likely between places with similar institutional structures. Lastly, the role of contingencies, critical junctures, and "windows of opportunity" is also referenced throughout the literature, whether it be a new government taking power or the onset of a "crisis" opening up new opportunities to reorient the policy agenda (Gilbert, 2004).

The literature on policy mobility has a heavy (almost exclusive) focus on processes by which policy movement advances neoliberal ideologies, policy instruments, and institutions. While this is a valid and important research area—and may well accurately represent the bulk of international urban policy circulation—it can overlook the reality that there are diverse groups of actors engaging in policy movement, with varied political projects (Clarke, 2012). Relatedly, Clarke (2012) argues urban policy mobility is not simply a negotiation between municipalities and internationally-oriented actors but that researchers must also pay attention to how urban policy movement is "negotiated with local citizens and their representatives, groups, movements, and organizations" (p. 34). Scholars with a historic lens, including those studying British planners' visits to the USSR and Scandinavia, complicate the assumptions of policy movement as an inherently neoliberal or largely recent phenomenon (Cook et al., 2014; O'Hara, 2008).

Even scholars who emphasize how neoliberal forces structure policy mobility also acknowledge that alternative visions of the world can be mobilized as well. On this point, it is worth quoting at length from Peck and Theodore (2010):

"Hegemony, however, is an always-incomplete process. The powers of network-normativity and model-making may be formidable, but they are far from totalizing, since they are also marked by contradiction and contestation ... Do such alt-models travel differently to those that (aspire to) reproduce dominant paradigms? This question, which may be an open one for now, calls attention to the transformative potential of (urban) contestation, raising the possibility that the new circuits of transnational policy development might be appropriated for progressive ends." (p. 171)

Putting the policy movement literature into conversation

Dolowitz and Marsh (2012) have responded to a variety of the critiques of the policy transfer literature leveled by geographers in the policy mobilities vein, arguing that these critics have "set up political transfer orthodoxy as something of a straw man" regarding claims of an overwhelming emphasis in the literature on the nation-state and the positivist assumption that "fully formed" policies are transferred by rational actors (p. 344). For instance, Dolowitz and Marsh's highly influential 1996 literature review of policy transfer already noted there was "too much positivism" and that "few scholars look at how the definitions of problems or solutions

are socially constructed. More importantly, they ignore the way that subjective definitions affect how and where searches are conducted and, also, what solutions are considered" (D. Dolowitz & Marsh, 1996, p. 357). Furthermore, Dolowitz and Marsh also acknowledge, yet reject, the view that policy is best viewed as a largely constructed object, a premise they see as flowing from a "constructivist" position which they do not adhere to.

The policy transfer and policy diffusion literatures have a regular dialogue with each other, while the policy mobilities strain is more isolated. Policy mobility discourses have been characterized as "restricted to the 'bubble' of critical geographers, urban scholars and some social movements and third party organisations" (Haupt, 2023, p. 9). While policy mobilities scholars have engaged with policy transfer and (to a much lesser extent) policy diffusion perspectives, political scientists and public policy scholars mostly "seem to have completely ignored the policy mobilities literature" (Haupt, 2023, p. 9). One critical reflection observed how the research focus on policy elites across the broader policy movement literature shifts attention away from the fact that "residents' knowledge and voices are commonly silenced" (Soaita et al., 2023, p. 115). Though it may be challenging or ill-advised in certain instances, scholars have suggested productive opportunities for synthesis, as the analytical and policy outcome-oriented approaches to policy movement (policy diffusion and policy transfer) can be enriched by the more critical approaches found in policy mobilities and vice versa (Haupt, 2023; Soaita et al., 2023).

2.2.2. Policy Models, Policy Imaginaries, and Housing Ideology

Certain concepts can help with clarifying how policy ideas are structured and identifying the actors responsible for conceiving and popularizing them. Critical scholars in housing studies have built upon work concerning the social construction of social problems by critiquing the dominant approaches to studying housing problems that tend to assume housing problems are "self-evident" (Atkinson, 2000; K. Jacobs et al., 2003). Instead, authors argue that this is a power-laden process and emphasize that "housing policy is a site of contestation in which competing interest groups seek to impose their definitions of what the main 'housing problems' are and how they should be addressed" (K. Jacobs et al., 2003, p. 442). This constructivist perspective relates to the concepts of housing ideologies and policy models, imaginaries, and narratives that will be surveyed in this section, ideas important to understanding how the Vienna Model is assembled and then reassembled.

Policy Models and their construction

Policy mobility scholars have built upon prior scholarship describing the role narratives play in the policy movement. An important object of analysis is that of the "policy model." A policy model is an "object of emulation" that "seek[s] to stabilize and validate an explicit set of rules, techniques, and behaviors, that when applied in 'foreign' settings might be expected to yield comparable results" (Peck & Theodore, 2010, p. 170). Though policy models are stylized abstractions—such as the "Barcelona model" of urban regeneration or the idealized urban sustainability approach of "Vancouverism"—they are always the product of a specific social, economic, and political context. These stylized representations are put forward as transnational models that can operate across contexts, and they are endowed with a representational power rooted in an association with a specific location, signaling "authenticity" and "feasibility." In discussing the significance of "tagging polices to places," Peck and Theodore (2010) argue "models that (appear to) come from somewhere travel with the license of pragmatic credibility, and models that emanate from the 'right' places invoke positive associations of (preferred forms of) best practice" (p. 171). This is an important aspect of understanding a policy model as a geographically infused knowledge object. Blanco (2009) probes the ontological basis of the place-tagged policy model, questioning the "temporal, territorial, and sectoral coherence of the so-called 'Barcelona Model'" that boosters and critics presuppose exists (pp. 356–357).

Policy models are not immaculately conceived but must actively be created and promoted. Certain key agents deliberatively act as "policy boosters," explaining and promoting a locale's "policy model success" to local and domestic validators, and crucially, to international audiences of policy experts, political leaders, multilateral organizations, academics, and consultants (McCann, 2013). This policy boosting work can involve the banal but difficult work of translating material into other languages (likely English) or the more conceptual work of simplifying complicated institutions and systems into digestible takeaways. Policy boosters are largely analogous to the concept of "policy entrepreneurs" in the public policy literature, in that both describe popularizers of particular policy ideas (Mintrom & Norman, 2009, p. 649). Some scholarship integrates the policy entrepreneurship and transfer literatures, categorizing policy entrepreneurs as key international transfer agents, specifically highlighting the role they play in policy transfer networks and forums (D. P. Dolowitz & Marsh, 2000; Petridou & Olausson, 2017).

Politically, there can be benefits to political leaders and policymakers in couching their proposed reforms as "best practices" or "lessons learned" that have "worked elsewhere." One can draw on the legitimacy of a "proven model" to validate one's position; challenges associated with the policy adoption can be framed as short-term transition costs; and policy failure can be blamed

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⁶ Other examples include Porto Alegre as the home of participatory budgeting (Su, 2017) or the Dutch model of cycling cities (Bruntlett & Bruntlett, 2018).

on poor local implementation of a "globally proven" model. Policy failure can even be used to justify a "doubling down" on the reform to ensure it can be implemented in an undiluted manner (Peck, 2011, p. 782). When looking at policy movement from West Germany to East Germany following unification, Locke and Wade (1997) critiqued over-simplification and overabstraction in policy movement efforts. Describing how actors—in an attempt to enhance comparability—commonly recited "highly stylized" accounts of institutional forms, focusing on "the way things are supposed to work" as opposed to how these institutions "actually operate in the real world" (Locke & Jacoby, 1997, p. 50). Furthermore, these "ahistorical and noncontextual" stylized accounts focused "primarily on the institutional design and structural features of the institutions themselves," and ultimately "jumped too quickly to normative and prescriptive analyses" (p. 50).

Policy imaginaries and narratives

The idea of policy models is also closely related to the concept of policy imaginaries and narratives. Scholars have observed that urban policy mobility involves "not only physical travel ... of people, models, texts, etc. ... but also imaginative travel of the kind associated with comparative urbanism" (Clarke, 2012, pp. 27–28). Policy mobility is predicated on the careful construction of certain policy narratives, framings, and persuasive storytelling to "convince actors in one city that their place is commensurate with another to the extent that policies formulated and implemented elsewhere might also work at home" (McCann, 2011, pp. 115–116). These imaginaries—a set of meanings, values, and institutions held in common and that constitute a particular worldview for a particular group—are socially produced and require the deployment of certain tropes and framings that the audience has prior comfort and familiarity with. The actors that constitute the "demand side" of policy mobilization are institutionally embedded and already predisposed to be attracted to certain "institutional fixes" and narratives (McCann, 2011).

Those in the policy mobility discourse argue that the frequent repetition and mobilization of certain urban transformation narratives lead to specific policy frameworks (predominantly those that align with dominant, neoliberal discourses) becoming "common sense" international best practices (González, 2011, p. 16). Some authors go on to argue that the rise of these hegemonic policy frameworks ends up constraining the growth of genuinely novel and creative urbanism models. For instance, while there is a ready market to hear about the lessons from Barcelona and Vancouver, "policy blogs are unlikely to be running hot, any time soon, with talk of the Havana model, Kabulism, or even lessons from Detroit" (Peck & Theodore, 2010, p. 171).⁷

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⁷ This list of cities, penned by Peck and Theodore, dates itself to 2010. By 2019, a corporate responsibility banking executive wrote a commentary piece titled "How Detroit Became a Model for Urban Renewal" and boasted that "JPMorgan took this [Detroit] model to France," when investing in Greater Paris (Scher, 2019). This small, telling example shows how temporally bounded notions of urban policy model success or failure can be. Policy models

González also describes how the repeated hosting of visitors across policy agencies and organizations in a city leads to the creation of a streamlined narrative of the city that emerges over time (González, 2011, p. 17). Furthermore, while international "lessons learned" are often presented by actors as politically neutral, policy movement authors emphasize how they are in fact mobilized selectively by proponents and opponents to gain advantage in political conflicts (Robertson, 1991).

Housing Ideology

Within the field of housing studies, ideology is a concept that has been used by a variety of scholars to understand how certain ideas in housing have become hegemonic and the power relations that shape the creation of a "housing common sense." Ideology has most commonly been mobilized to analyze the elevated status of homeownership (Arundel & Ronald, 2021; Kemeny, 1981; Ronald, 2008) in contrast to the stigmatization of renting (Hulse et al., 2019). Arundel and Ronald note how the ideology of mass homeownership has achieved widespread political support, crucially, during historically contingent periods of labor and housing market conditions, and has "enabled both an ongoing commodification of housing as well as a shift from state welfare provision towards models of privatized asset-based welfare" (Arundel & Ronald, 2021, p. 1122).

In their study of co-living, White and Madden (2024) use the term housing ideology to "refer to the dominant ideas and knowledges about housing that are deployed to justify or legitimize the residential status quo, helping either to maintain it in the face of challenges or to push it in specific new directions congenial to particular social interests" (p. 1371). Though these housing ideologies are critical to underpinning the present status quo, they are not only concerned with the contemporary moment or an idealized past. Housing ideologies can also be future-oriented, "gain[ing] legitimacy by circulating images of the future," such as the prospect of future stability, asset accumulation, and generational wealth by way of homeownership (White & Madden, 2024, p. 1375). Competing housing ideologies have challenged the dominance of homeownership, including public housing (Marcuse, 1986; Radford, 1997) and cooperative housing (Bengtsson, 1992).

are not exclusively the most praised city in a particular policy domain, but they can also be those that have had rapid "success" or can tell the story of a revival arc.

3. Methodology

3.1. Research Design

This thesis examines how the "Vienna Model" of social housing was assembled as an international best practice in certain U.S. housing policy circles in response to housing precarity, gentrification pressures, and perceived policy failure of existing U.S. affordable housing models. Attention is also paid to the role Viennese actors play in constructing and projecting Vienna as a "capital of social housing" and a city worth emulating. Drawing heavily upon the policy mobility literature, this work is attuned to how policy assemblages and relational dynamics complicate a simple A-B direction of policy flow (McCann, 2011; Peck & Theodore, 2010; K. Ward, 2011). As such, the research will approach this topic in a relational, multi-sited manner. Tracing how policy knowledge is "assembled" by Viennese housing actors and international consultants; "mobilized" to the U.S. context via Vienna study delegations, journalism, and social housing policy reports; and "reassembled" in local U.S. contexts in mutated form during advocacy and policymaking processes. At the same time, elements of the policy analysis-oriented policy transfer literature are deployed when seeking to understand the American social housing policymaking process (D. P. Dolowitz & Marsh, 2000). Two case studies of the Vienna Model being reassembled in the United States are presented: the City of Chicago and the City of Seattle. The multiple sites—Vienna, Chicago, and Seattle—are necessary because policy mobility is a "profoundly geographical enterprise" that "requires careful attention to the multiple and overlapping spaces of policy making" (Cochrane & Ward, 2012, pp. 5–6).

Policy mobility is, at its core, both a social and comparative phenomenon. As McCann (2011) notes, policy mobility is a "social process enacted through the apparently banal practices of bureaucrats, consultants, and activists," and it requires "attention to the representational and comparative practices of these actors and to related questions of commensurability" (p. 115). The comparative lens is central to this project. In looking at the policy movement of social housing ideas and instruments between Vienna and American cities, this thesis follows the long tradition of comparative urbanism and is deeply informed by comparative housing studies. Nijman (2007) defines comparative urbanism as "the systematic study of similarity and difference among cities or urban processes. It addresses descriptive and explanatory questions about the extent and manner of similarity and difference" (Nijman, 2007, p. 1). After a decline in comparative urbanism in the 1970s and early 1980s, Nijman narrates a renaissance in the 2000s, fueled by scholarly interest in globalization and how it is mediated by place.⁸

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⁸ Nijman argues that the decline in comparative urbanism coincided with the ascendancy of postmodern approaches and a sense that comparative approaches were associated with modernism, developmentalism, and scientism. Some in this more recent comparative urbanism wave have strongly questioned the utility of "global"

The methodologies in policy mobilities are primarily qualitative, tending to include case studies, discourse and document analysis, and semi-structured interviews (Peck & Theodore, 2010). Some scholars have called for multi-scalar, multi-sited ethnography to trace the process by which policy is socially constructed and mobilized across space and time, referring to sociological methods such as "global ethnography" and "extended cases" (McCann, 2011; Peck & Theodore, 2012). The subjects of research tend to be non-state actors (NGOs, consultancies, multinational corporations) as well as private consultants and policy advisory organizations (Haupt, 2023). In introducing a taxonomy of comparative urbanism approaches, Robinson (2016) places policy mobilities scholarship under the category of "tracing connections" and describes core features as "circulating practices leading to direct comparative reflections" (p. 196).

Given the topical focus on social housing, I also draw upon scholarship at the intersection of comparative housing studies and comparative welfare studies (Kemeny, 2001; Matznetter & Mundt, 2012). Sarioğlu Erdoğdu's (2010) review of the broader housing and comparative housing studies literature describes how "comparative housing research is as old as housing research itself," detailing the variety of topics and approaches in the field and a longstanding interest in transnational work, despite the challenges in execution (pp. 73–74). Compared to other social welfare domains, housing is unique in its capital intensity and embeddedness in the economy, and social housing is enmeshed with other welfare state pillars (e.g., retirement policy, income support, etc.) (Matznetter & Mundt, 2012). A strong political-economic understanding of the housing institutions and ideologies at play in Vienna and United States cities is crucial for effectively understanding the broader context social housing fits into and the impediments to policy mobilization. To this end, the thesis provides an overview of the Austrian and United States welfare systems; situates the respective housing systems in their broader welfare systems; and summarizes selected pillars of housing policy in Vienna (as well as Austria) and the United States.

I also put recent attempts at housing policy mobility into historical context and draw parallels between contemporary international social housing policy circulation and non-market housing policy exchanges between Europe and the United States in the 1920s and 1930s (Radford, 1997), keeping with a thread of the literature that has emphasized how urban policy model creation and policy knowledge circulation is not a new phenomenon (Myers, 2003; Clarke, 2012; Harris & Moore, 2013). The history of planning literature teems with rich appraisals of the way

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models." Instead, pushing for a provincialization of urban theory and embracing a focus on particularity and local complexity to allow for the flourishing of new "comparative imaginaries" in the global South and East. A push that has found support, paired with calls to nuance claims of comparative urban exceptionalism (Peck, 2015).

⁹ For example, the international spread of urban planning ideas, such as the Garden City in the 1890s and early 1900s, was "facilitated by the formation of organizations such as the Garden City Association and the International Garden City Congress, and learning opportunities offered by study visits and international conferences" (Harris &

power relations and coercion mediate transnational policy knowledge, technology, and model spread, especially with respect to colonial governance as a mechanism for disseminating urban planning ideologies (King, 1977; Banerjee & Chakravorty, 1994; Myers, 2003) and postcolonial developmentalist continuities (Banerjee, 2009; S. V. Ward, 2010). A corrective to the ahistorical framings and presentism found in some of the policy mobility and policy transfer literature, which positions policy movement from the 1990s onwards as a unique outcome of intensified globalization. This historical context is also valuable as some contemporary American social housing advocates excavate and mobilize this past U.S. engagement with European social housing in present-day discourses (Daniel Denvir, 2023; Penner, 2018).

Research questions

RQ1: How has the "Vienna Model" of social housing been assembled and mobilized as an international best practice, particularly for U.S. audiences, by multiple actors?

RQ2: What are the successes, tensions, and contradictions that arise when ideologically diverse housing actors attempt to reassemble ideas and/or policy instruments from the "Vienna Model" of social housing into the highly commodified U.S. housing system and welfare regime?

Case study selection

The cities of Chicago and Seattle were chosen as preliminary case studies to observe Vienna Model mobilization, because U.S. social housing advocacy has the most momentum at the local level. Furthermore, both cities had housing actors join Vienna study delegations to learn about the social housing system in 2024, before major policy initiatives, and housing actors in both cities cited Vienna as one of their models of inspiration (House our Neighbors, n.d.; IL Green New Deal, n.d.-a; Christina Rosales, 2024). While New York City and California (at the city and state levels), have some of the most vocal social housing movements in the U.S., for the most part, these advocacy efforts are still primarily at the proposal and study stages (See Figure 2). Moreover, the housing policies of cities in California and New York already attract a sizable share of U.S. media attention and academic scholarship.

Though the top-level parallels between Chicago and Seattle are striking, actors in the two cities took distinctive approaches to advancing social housing policy. In Chicago, the legislation to create a "Green Social Housing" program went through a contested City Council process with the support of a progressive Mayor and Department of Housing staff, alongside housing

Moore, 2013, p. 1501). Scholars mention that the Garden City concept became used in an increasingly loose and capacious manner as it spread beyond Britain. Furthermore, Harris and Moore (2013) point out how the creation of the Garden City as a portable, technical "global form" required it to be decontextualized and recontextualized—a process that also resulted in the Garden City being "shorn of its more socialistic features" (p. 1501).

activists, with passage in May 2025 (City of Chicago, Office of the Mayor, 2025a; Heather Cherone, 2025). Whereas in Seattle, grassroots activists were the primary movers, running the Seattle Social Housing developer proposal as a highly politicized ballot campaign. Seattle voters approved two separate ballot measures to establish the Seattle Social Housing Developer—first to establish the public entity in 2023 and second to create an annual, progressive tax revenue stream in 2025—overcoming the opposition of most city elected officials and organized business interests (Josh Cohen, 2025; McNichols, 2023). Looking at the two case studies, with their differing policy options, funding sources, and political approaches, provides a useful contrast in analyzing what happens when counter-hegemonic policy models "touch down." Given the recency of these policy developments, the analysis will be kept to a high level and should be considered provisional.

Social Housing Progress in the U.S.

Social housing is rapidly gaining popularity in the United States. Cities, counties, and states all over the country are passing or introducing legislation to build social housing. The below map highlights the efforts we are aware of.



Figure 2 - Map of Social Housing Progress in the United States. Source: House our Neighbors, 2025

3.2. Data Collection Methods

Literature and Document Review

Utilizing the concepts from my conceptual literature analysis, I review academic literature, policy reports, media articles, academic and general audience books, podcasts, social media posts, and online videos on Vienna social housing and efforts to develop "social housing" in the United States. This extends to a review of primary and secondary historical sources concerning the history of the influence of Vienna's housing program. There is a rich tradition of textual, qualitative approaches to the city (J. M. Jacobs, 1993). Document analysis is one qualitative tool that can be used for many urban studies research projects, and it is defined as "a systematic procedure for reviewing or evaluating documents—both printed and electronic" (Bowen, 2009, pp. 27–28). Following Bowen (2009), the term "document" is capacious enough to include "advertisements; agendas, ... background papers; books and brochures; diaries and journals; event programs ... newspapers; press releases; program proposals ... organisational or institutional reports; survey data; and various public records," among other media (pp. 27–28). Given my research design included case studies, this research method was a strategic choice as "document analysis is particularly applicable to qualitative case studies—intensive studies producing rich descriptions of a single phenomenon, event, organisation, or program" (Bowen, 2009, p. 29).

Stakeholder Interviews

Policy mobility scholars emphasize the importance of in-depth interviews with informants that avoid overly proceduralized questions and instead insist, "interviews should be interactive, dynamic encounters, not merely extractive, fact/opinion-gathering exercises; they entail dialogue as much as digging" (Peck & Theodore, 2012, p. 26). Taking guidance from the policy mobility and transfer literature, which contains rich elaborations of who is engaging in policy transfer (or mobilizing policy), I interviewed informants in each of the following categories:

- 1. U.S. local government housing officials engaging in social housing policymaking
- 2. U.S. social housing activists and tenant advocacy groups
- 3. U.S. researchers and policy analysts who popularize "social housing"
- 4. Vienna housing experts who participate in U.S. social housing study delegations
- 5. Consultants and professional educators who promote the "Vienna Model" to U.S. audiences by organizing study delegations

Stakeholders were identified for interview based on document review, journalistic accounts, and personal contacts that I developed both in the United States and in Vienna. Interviews with researchers, some U.S. advocates, and Vienna housing experts were recorded. Interviews with

active officials within the Mayor's Office in Chicago and Seattle Social Housing Developer were not recorded, but extensive contemporaneous notes were taken. Given the politically sensitive nature of some of the conversations—especially as some social housing legislative processes were ongoing and contested—I decided not to record these interviews to encourage candid and critical reflections. Some interviews were undertaken at research conferences I attended, such as the 2025 International Social Housing Festival in Dublin. The quotes used from the interviews were lightly edited for clarity when necessary. In my written correspondence with interviewees, I requested consent to use their interviews strictly for research purposes and began each interview with a request for verbal consent and informed participants I would not attribute any quotes to them by name.

Though not a core aspect of the formal results, I had extensive informal experiential, observational, and ad hoc conversations about the influence of the Vienna Model of social housing and how it is circulating internationally during the research and writing process. This included: informal conversations with Vienna-based housing researchers, journalists, and municipal officials; joining Vienna social housing tours and delegations of international visitors; informal conversations with American academics and housing policy officials; and observing U.S. and Viennese housing actors' presentations about social housing at the 2025 International Social Housing festival in Dublin.

Location	Organization/Individual	Interviewee Label
Vienna	Municipal Department 50 - Housing Promotion and Arbitration Board for Legal Housing Matters, Strategic Projects and International Affairs Division	Interviewee 1
	Austrian Federation of Limited-Profit Housing Associations (GBV)	Interviewee 2
	Vienna Social Housing Delegation Organizer and Educator	Interviewee 3
Chicago	City of Chicago Mayor's Office	Interviewee 4
	Chicago-based housing policy expert	Interviewee 5
Seattle	Seattle Social Housing Developer	Interviewee 6
	House Our Neighbors	Interviewee 7
	House Our Neighbors	Interviewee 8
	House Our Neighbors	Interviewee 9
New York	Community Service Society of New York	Interviewee 10

United States	National Policy Organization	Interviewee 11
United States	Center for Public Enterprise	Interviewee 12
Informal	Social Housing Delegation of French Housing	
Experiential/Observational	Journalists, Vienna	
	Austrian Society for Architecture (ÖGFA) Social	
	Housing Tour, Vienna	
	Stakeholder Meeting on Strategy for Passing	
	Chicago's Green Social Housing Ordinance,	
	Remote	
	Das Rote Wien im Waschsalon (Karl Marx Hof	
	Red Vienna Museum and Tour), Vienna	
	City of Portland, OR Housing Bureau Social	
	Housing Retreat, Portland	
	2025 International Social Housing Festival,	
	Dublin	
	Internship at Research Center for New Social	
	Housing, TU Wien, Vienna	

Table 2 - List of stakeholder interviewees and Informal observational experiences

Preliminary Policy Analysis

Lastly, I conducted a preliminary policy analysis of two "social housing" programs being operationalized in the U.S. In Seattle, this includes the founding charter and literature around the Seattle Social Housing Developer. In Chicago, this focused on the establishment of a Green Social Housing Revolving Fund that was authorized in a municipal bond issue, and specifically the ordinance establishing the Residential Investment Corporation—the nonprofit entity controlled by the city to build "Green Social Housing."

3.3. Data Analysis Procedures

For RQ1, I focused on a combination of thematic analysis of policy reports, policy documents, legislative testimony, quotes by politicians, news media, podcasts, videos, etc. as well as interviews with social housing policy actors in Vienna and housing researchers, policy entrepreneurs, and advocates in the U.S. A starting point was the policy mobility framework that emphasizes the social construction of policy knowledge. As an approach, "thematic analyses move beyond counting explicit words or phrases and focus on identifying and describing both implicit and explicit ideas within the data, that is, themes" (Guest et al., 2012, p. 12). This method was suited for the goals of RQ1, which dealt with deeply conceptual matters.

For RQ2, a starting point will be adapting the Dolowitz and Marsh policy transfer framework, which proposes several questions for policy transfer researchers to investigate: (1) Why do

actors engage in policy transfer?; (2) Who are the key actors involved in the policy transfer process?; (3) What is transferred?; (4) From where are lessons drawn?; (5) What are the different degrees of transfer?; (6) What restricts or facilitates the policy transfer process?; (7) How is the process of policy transfer related to policy "success" or policy "failure"? (D. P. Dolowitz & Marsh, 2000). The thematic analysis of stakeholder interviews of U.S. actors alongside policy document analysis drove the exploration of RQ2.

3.4. Limitations and Positionality

Due to the timeline of the research, I was unable to be physically present for the study delegations of Chicago and Seattle housing actors to Vienna. This would have provided rich material and better context for understanding what role policy tourism played in their policy initiatives and their interpretation of the "Vienna Model."

In terms of positionality, my professional experience shapes both my access to certain housing actors as well as my interpretations (Mikecz, 2012). I was previously employed by the City of Chicago Mayor's Office and the Department of Housing, and some of my interview subjects were housing actors I had professional connections to in the Chicago housing field or were introduced to me via these preexisting relationships. Even to unfamiliar informants based in Vienna or Seattle, being able to reference my previous life as a policy professional may have enhanced my legitimacy in the eyes of some of the policy elites I interviewed and made them more receptive to granting access—a crucial barrier for many qualitative researchers (Mason-Bish, 2019; Mikecz, 2012).

Given the way the term "policy elite" is wielded in the urban studies and policy movement literature to include certain policy professionals (Henriksen & Seabrooke, 2021; Peck & Theodore, 2012), I could be considered a temporarily displaced minor "insider" (Chavez, 2015), interloping in the critical urban studies field that is "relatively marginal in urban development today" (Robin & Acuto, 2023, p. 439). While this is, in part, a strength—as few critical urban scholars actually have experience working in the urban policy bureaucracies and political processes they critique—it may also mean I have become predisposed to certain policy elite assumptions and narratives. Furthermore, I spent a significant amount of time with various Vienna Model educators and housing actors, including attending conferences and events alongside them. While Peck and Theodore (2012) emphasize the importance of deep engagement with informants, they also warn of "the challenge ... of traveling within cosmopolitan policy networks without becoming another creature of those networks," which can induce excessive credulity (p. 25).

Lastly, I chose two American cities where social housing policy mobility is in play, but many other locations could have provided rich insights. The case studies also reveal a bias for

locations where some degree of policy movement was "successful," to the exclusion of sites with policy immobility or "failed" policy movement (Malone, 2019; Wells, 2014). ¹⁰ Places where not only is the Vienna Model being invoked, but also there have been housing actors attending study delegations to Vienna include: New York City; Los Angeles, San Francisco, and elsewhere in the State of California; and the State of Hawaii. A final limitation is that many of these social housing programs are very new. Chicago's social housing effort was passed by its city council in May 2025. Seattle's social housing entity was created by voter initiative in 2023 and was only allocated a dedicated funding stream in February 2025, after a second voter ballot measure was approved. Therefore, neither of the two cities' programs have been operational long enough to produce any initial developments or draw deeper conclusions about how the policy models function in practice.

4. Analysis: Welfare and Housing Systems in the United States and Vienna (Austria)

4.1. Vienna (Austria) Welfare and Housing Landscape

4.1.1. Austrian Welfare and Housing Overview

Internationally, there is a tendency to view the "Vienna Model" as a purely local object and ignore the broader context of the national Austrian welfare and housing systems. ¹¹ Austria is traditionally seen as a strong example of a conservative-corporatist welfare state that is neither residualist nor universalistic in orientation (Matznetter, 2002). Additionally, "Austria has been

¹⁰ For example, in 2020, there was a Washington D.C. Council candidate running on establishing "social housing" in D.C., and legislation was introduced to the Council in 2022 to create an "Office of Social Housing Developments." However, there has not been substantive legislative progress on this proposal (Ally Schweitzer, 2022; Amanda Michelle Gomez, 2022).

¹¹ Supranational Institutions, like the European Union, also impact social housing in Austria and, therefore, Vienna. EU state aid policies and Service of General Economic Interest (SGEI) rules regulate government involvement in the market under the rubric of a competition policy that aims to avoid "[distorting] competition and trade in the single market, unless justified by reasons of general economic development" (Braga et al., 2013, p. 38). This assumes a division between government and market that is particularly problematic for housing. While there are exceptions for social housing, in defining social housing for the purposes of SGEI, a restrictive definition was used that limited it to be housing for disadvantaged groups unable to obtain housing on the market. Disputes over state aid to social housing in Sweden and the Netherlands were a factor in significant changes to their universalistic models. Following complaints to the European Commission from real estate industry groups that public subsidies distorted market competition and disadvantaged their members, Sweden required Municipal Housing Companies to operate according to "businesslike principles," and in the Netherlands, further income targeting of social housing was required (Braga et al., 2013). Austria's accession to the EU also required Vienna to allow EU citizens to access the social housing system starting in 1995 and allow entry of all foreign citizens with permanent residence cards (and recognized refugees) in 2006 (Essletzbichler & Forcher, 2022, p. 131; Friesenecker & Kazepov, 2021, p. 83).

identified as an example of a unitary or even an integrated rental market ... although the liberalization of rent regulation in the 1990s has triggered a dualization between private and social rents and thus challenged this categorization to some extent" (Kadi & Lilius, 2024, p. 1613). The historical corporatist elements of Austrian housing policy include "interest intermediation, involving a party-related network of non-profit housing associations," which entailed the allocation of housing construction subsidies to housing associations tied to various political parties and interests (Matznetter, 2002, p. 277). Additionally, the "familialist" aspects of Austrian conservative welfare state housing policy refer to the important role of inheritance for constructing single family homes, providing downpayments for limited profit housing, taking over family homes in urban and rural areas, and the transfer of rental contracts within the family in the private and social rental sectors (subject to certain criteria, primarily cohabitation).

Regarding Austria's housing landscape, Austria is unique in its housing tenure among European Union member states. Based on 2024 statistics, nearly 70% of the EU population lives in households owning their own home—yet the picture is much more balanced in Austria. Nearly 46% of the Austrian population lives in tenant households (See Figure 3), the second-highest figure in the EU behind Germany (Eurostat, 2024). Austrian housing policy (especially in Vienna) tends to approach housing affordability from a housing supply and construction strategy focused on multi-story rental housing, with relatively low emphasis on demand-side housing allowances or tax subsidies (Matznetter, 2002, pp. 273–274; Friesenecker & Litschauer, 2021, p. 74). Additionally, Matznetter (2002) describes how housing policy in Austria is "badly institutionalized, with responsibilities being scattered amongst ministries and levels of government" (p. 274). According to the Organisation for Economic Co-operation and Development (OECD, 2024a), social housing represents 23.6% of the housing stock in Austria, the second highest in the OECD behind the Netherlands. In contrast, the 0.09% of GDP Austria spends on housing allowances is much lower than its wealthy peers in the OECD and less than the United States (OECD, 2024b).

Austria has a unique "third sector" limited-profit housing system, where housing is provided by private, non-profit actors (Koessl, 2022). Instead of an income-based approach to rent setting, the Austrian limited-profit cost-rent regime has rents set to reflect the full cost of constructing and operating housing. This all reflects an important principle: "the housing system is not expected to compensate for inadequate incomes or meagre social welfare. Rather, its role is to provide decent housing in the most cost-effective manner that in turn reduces the burden on wages and welfare" (Deutsch & Lawson, 2012, p. 57). This cost-rent, limited profit housing policy framework is set at the national level. For funding, Austria imposes a 1% payroll tax, paid by both employers and employees, that was historically exclusively dedicated to housing production; however, a decentralization of housing policy removed the requirement that these funds must be used only on housing (Friesenecker & Litschauer, 2021, pp. 73–74). Starting in

1989, each federal state can decide its own housing policy and how to make use of these funds. Some Austrian scholars argue in favor of the efficiency of this housing system, pointing out that while "many countries [have] reduced public expenditure on investment into affordable housing, public expenditure in total has in many cases not gone down but was shifted towards housing allowances (Koessl, 2022, p. 33).

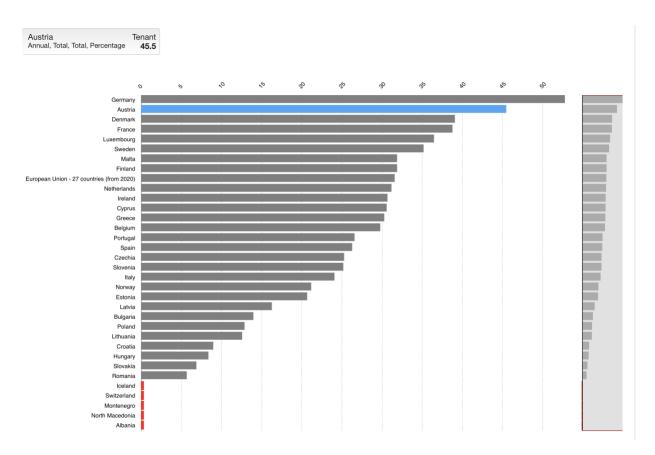
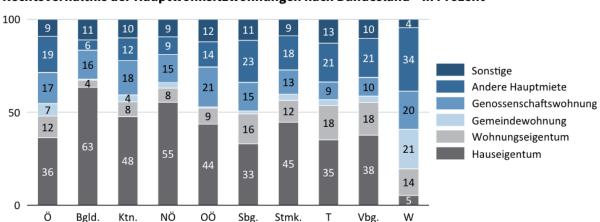


Figure 3 - Share of people living in households owning or renting their home, 2024 (in %). Source: Eurostat, 2024

Vienna tenure introduction

Looking at the housing tenure in Vienna, only 19% of households own their primary residence, and 80% of inhabitants rent their homes. As has been the case for decades, in 2024, social housing is the largest tenure in Vienna at 41% of the primary residences in the city, split nearly equally between 21% *Gemeindewohnung* (municipal housing) and 20%

Genossenschaftswohnung (Limited Profit Housing Associations). The private rental sector makes up only 34% of the housing tenure in the city (Statistics Austria, 2025). Amongst Austrian federal states, Vienna is an outlier regarding the large scale of its social housing sector (See Figure 4).



Grafik 3.3

Rechtsverhältnis der Hauptwohnsitzwohnungen nach Bundesland – in Prozent

Q: STATISTIK AUSTRIA, Mikrozensus Wohnen 2024.

Figure 4 - "Legal status of primary residences by federal state - in percent." To interpret, "Ö" represents all of Austria, and "W" represents Vienna. The remainder are the other eight Austrian federal states. The chart segments in blue represent rental housing tenures: Gemeindewohnung (municipal housing); Genossenschaftswohnung (limited profit housing); Andere Hauptmiete (other primary rent); Sonstige (Other). For ownership categories: Wohnungseigentum (condominium ownership) and Hauseigentum (homeownership).

Alongside the large, subsidized housing sector, the private rental market is highly regulated, historically subject to strong rent controls and unlimited-term rental contracts. The existing rent-controlled units in the older housing stock continue to play an important role in dampening rents, but since the 1990s, the national Tenancy Act has been liberalized to allow for more market-based rents and limited-term rental contracts (Friesenecker & Kazepov, 2021).

4.1.2. The Pillars of the "Vienna Model"

Reaching back to the "Red Vienna" era of municipal socialism of the interwar period, Vienna has had a sustained investment in social housing. While the social housing policy instruments have changed over the past century, the city is still renowned for its strong commitment to non-market housing and the notable stability of its housing system in contrast to other cities that have seen severe retrenchment and selling off of non-market units (Kadi & Lilius, 2024).

In some publications, the City of Vienna presents the "Vienna Model" as consisting of three pillars: municipal housing developments built and managed by the City¹²; subsidized housing built and managed by limited-profit housing developers; and renovated buildings refurbished

¹² Technically, this housing is not owned and operated directly by the City of Vienna, but instead by *Wiener Wohnen*, a city-owned company.

through so-called "gentle urban renewal." Since 1984, there were 7,463 residential buildings, with roughly 322,700 housing units, renovated in the context of "gentle urban renewal" (City of Vienna, n.d.-b). Nearly 50% of inhabitants live in some form of social housing, as defined by the city: roughly 220,00 municipal flats and 200,000 in subsidized dwellings (City of Vienna, n.d.-c; Kadi & Lilius, 2024). That said, there is no official, legal definition of "social housing" in Vienna, and most internationally-oriented observers use it as an umbrella term to refer to the two main non-market housing sectors—municipal housing (*Gemeindebau*) and limited profit housing associations (Gemeinnütziger Bauvereinigungen) (Angel & Mundt, 2024; Kadi, 2015). Given that the City of Vienna is also one of the nine federal states of Austria, it can impose its own conditions on public financing within this framework. Importantly, public funding for new construction is generally available to both limited-profit and for-profit housing providers, provided that these actors agree to below-market rents until the mortgage is paid off. While a full description is beyond the scope of this thesis, demand-side housing assistance does have a role in Vienna's housing system, including housing allowances (*Wohnbeihilfe*), rent benefits (*Mietbeihilfe*), and rent allowances (*Mietzinsbeihilfe*).

A notable aspect of the Vienna Model is the city's active land banking policy. Founded in 1984, the City-owned land banking entity, wohnfunds_wien (Housing Fund of Vienna), is a key tool that enables the municipality to steer the direction of housing provision in the city; since its creation, wohnfunds_wien has provided approximately 3.7 million square metres of land for more than 51,400 subsidized new apartments (wohnfonds_wien, n.d.). Today, wohnfunds_wien holds roughly 3.1 million square meters of land and continues to purchase agricultural land and brownfield sites to enable long-term housing construction. Friesenecker and Litschauer (2021) describe how the main objective of the municipality's land policy is "central land acquisition to keep land prices low, limit competition between (limited profit) developers and secure land for future urban developments (p. 73). The provision of low-cost land is key to the development of social housing, as land costs are capped below market rates. Nonetheless, this land banking strategy has faced significant challenges following 2008, when increased market activity of commercial real estate developers bid up land costs in Vienna.

In response to rising land costs, the municipality introduced a new "Subsidized Housing" zoning category to its building code in 2018, which requires builders on large, newly rezoned land plots to devote at least two-thirds of all usable residential floor area to subsidized social housing (City of Vienna, n.d.-e).¹⁴ Yet this subsidized social housing is temporary, and the "rent caps and a ban on resale apply for the duration of the subsidy (usually 40 years)" (Friesenecker & Litschauer,

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¹³ Vienna's "gentle urban renewal" policy began in the 1970s, and continues until today, aiming to upgrade older portions of the housing stock and public space without displacing current inhabitants.

¹⁴ This zoning designation is primarily used when industrial or commercial areas are reclassified as "building land" and residential is newly allowed. It is also occasionally used to densify residential or mixed-use areas.

2021, p. 73). In practice, this new social housing zoning designation has only been applied to a small number of parcels, and its effectiveness remains to be seen. In conjunction with the land banking policy, developer competitions are another important policy instrument to steer housing provision. The developer's competitions are an architectural and urban design tender process organized by *wohnfunds_wien* since 1995, which seeks to ensure the social orientation and housing quality of new housing developments (Friesenecker & Litschauer, 2021; wohnfonds_wien, n.d.). A multi-disciplinary jury of housing experts, architects, land use planners, city officials, and others is used to award City-owned plots and housing subsidies for large-scale projects. Projects are subject to evaluation on four pillars: economic, architectural, ecological, and social sustainability.

For the sake of brevity, this thesis cannot go over all the interrelated elements of Vienna's complicated social housing ecosystem. Other elements include tenant counseling services, eviction prevention tools, energy efficiency retrofits, and the intentional co-location of social infrastructure like kindergartens, community centers, and other amenities in social housing developments (City of Vienna, n.d.-d). Furthermore, besides the municipal housing and limitedprofit sectors, which will be focused on below, the City of Vienna in recent years has begun to subsidize and allocate land to alternative housing arrangements, such as co-housing projects (Baugruppen and Wohngruppen). The cooperative living projects emphasize resident selfdetermination and consist of groups of prospective residents gathering to "initiate, plan and (co-)develop collaborative housing for self-use and communitarian services" (Friesenecker & Litschauer, 2021, p. 78). Though quite small-scale thus far, these innovations to the Vienna social housing system raise intriguing possibilities. Nonetheless, access remains an issue, as Friesenecker and Litschauer (2021) observe, "tenants in co-housing are usually more homogenous in socio-economic and socio-demographic terms than tenants in mainstream social housing ... [and] it is largely the higher educated groups with sufficient financial and time resources who are able to participate in and finance the planning process of such projects" (p. 79).

4.1.3. Municipal Housing Sector

Viennese municipal housing (*Gemeindebau*) provides the historic and social background context regarding what makes the city so renowned for its approach to housing in the present day. During the Red Vienna (*Das Rote Wien*) era, as the period from 1918-1934 came to be known, the ruling Social Democrats launched a vast project of social reform, encompassing public health, education, the arts, and housing (Marcuse, 1985). In 1914, Vienna was the fourth-largest city in Europe and the capital of the Austro-Hungarian Empire. However, most of the city's housing stock was of deplorable quality, and there was a severe housing shortage for working

people. Following the defeat and dissolution of the Austro-Hungarian empire, Vienna swiftly became the capital of a small landlocked republic, and the city faced an enormous housing crisis. Due to the strong rent controls, hyperinflation, and eroded savings, private sector investment in the housing sector had collapsed by the early 1920s (Holzner & Huberman, 2022). The establishment of Vienna as its own federal state was a key development in 1921, as it provided the foundation of tax sovereignty that enabled the Social Democrats to pursue their ambitious social program. The radical housing demands of the grassroots "Vienna Settlers Movement," which began occupying greenbelt land in the city outskirts to build self-help communities, also pressured the city to respond to the housing question (Förster, n.d.; Marcuse, 1985, pp. 205–206).

Initially, the Social Democrats of Vienna aimed to use private sector solutions to spur housing construction, such as exempting private builders from municipal taxes, but this proved ineffective. The turn to public resources and financing emerged in a more "tentative and exceptional manner," with the construction of four new apartment blocks of 658 housing units in 1922 (Holzner & Huberman, 2022, pp. 54–55). Later, effectively responding to the severe shortage of decent housing for the working classes, the radical Social Democrats that governed the city built more than 60,000 units of municipally owned housing, with rents set a very low levels and funded by highly progressive luxury and housing taxes (Kadi, 2015; Marcuse, 1985). Following this massive building campaign, in 1933, roughly 200,000 residents, or 11 percent of Vienna's inhabitants, lived in municipal housing. This progressive period came to a brutal end, following the constitutional crisis and the Austrian Civil War of 1934, which marked the beginning of fascist rule (Holzner & Huberman, 2022, p. 50). With the critical exception of the National Socialist period, the Social Democrats have been an outright majority or senior governing party in the City of Vienna government for the last century.

After the Second World War, the city restarted municipal housing construction with significant housing stock expansion. Yet by the 1970s, the limited profit housing sector had become increasingly dominant in producing new social housing (Friesenecker & Litschauer, 2021, p. 77). Entering the 1990s, the city wound down the construction of new municipal housing; however, the City of Vienna never systematically sold off municipal housing, even as it did significantly shift the mechanisms and instruments used to produce social housing. Greater reliance on the limited-profit sector was rationalized with the argument that the limited-profit housing sector was more cost-effective and required less subsidy per unit in a context of

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¹⁵ In the 1970s, the construction of multifamily social housing (by both limited-profit and public developers) peaked, representing a "golden age" of Austrian social housing, driving the production of "around half of all new housing in the country and 80–90 per cent in urban areas" (Matznetter, 2002, p. 276). While this surge resulted in problematic side effects on ecology, architecture, and regional planning, by roughly 1980, the post-war goal of equilibrium between supply and demand was largely met. Waiting lists for social housing disappeared, the ownership sector changed from a sellers' to buyer' market and demands for devolution of housing policy grew.

growing local budget shortages (Kadi, 2015, p. 253). Finally, Vienna halted municipal housing construction in 2004. Though after increased public pressure tied to growing housing affordability challenges in Vienna, the municipality relaunched municipal housing construction under the *Gemeindebau Neu* (new municipal housing) banner in 2017 (*Wiener Wohnen - Gemeindewohnungen*, n.d.)¹⁶

A unique element of Vienna's municipal housing system is its universalistic orientation that (theoretically) allows broad access to municipal housing. In 2025, the income limits for access were 59,320 Euros for a single person and 88,400 Euros for two persons—these relatively high limits mean that roughly 75 percent of the Viennese population can access the housing on the basis of income (City of Vienna, n.d.-a). However, *Wiener Wohnen's* allocation process is more complex than just income. Populations with "justified housing needs" and those who have resided in Vienna for a longer period are prioritized on the waiting list for subsidized and municipal flats. These social criteria include: overcrowding of current flat; preferential treatment for young people (household formation of first movers); special needs; separate households resulting from divorce; old-age related housing needs (barrier-free design); wheelchair user/person requiring a barrier-free home; and single parents. While there is no unrestricted right for a tenant to transfer a unit, a close relative who has resided in the same household for two years can take over the lease when the previous main tenant moves out.

The high degree of "social mix" is another element of Vienna municipal housing that is often discussed. Through the late 1980s, multiple factors, including population decline, a high share of low-quality private rentals, growth of high-quality municipal housing stock, and high income thresholds, made the municipal housing sector attractive to Austrian citizens (foreign residents were then excluded) (Essletzbichler & Forcher, 2022, p. 130). This contributed to a socially diverse (by education and employment) but ethnically homogenous municipal tenant population. Entering the 1990s, these trends changed, and social diversity declined while ethnic diversity increased. Previously, access to municipal housing was only available to Austrian citizens with proof of residence in Vienna, but "accession to the EU meant that the public housing market had to be opened to EU citizens in 1995 and to all foreign citizens with permanent residence cards in 2006" (Essletzbichler & Forcher, 2022, p. 131) ¹⁷

Rapid population growth driven by EU accession, the partial deregulation of strict rental control laws, and a jump in investor interest in Vienna's private rental sector have all led to significant

¹⁶ An interviewee mentioned that while this was framed as restarting "municipal housing," the financial structure is effectively that of a limited-profit subsidiary organization controlled by the City of Vienna (Interviewee 2).

¹⁷ The allocation criteria and access to municipal housing is a highly politicized component of municipal housing. In 2015, during a reform of the allocation criteria, the city introduced the *Wiener Wohnticket*, which provided a preference to long-term Viennese residents and had the impact of "extend[ing] exclusionary barriers for (foreign) newcomers to municipal housing" (Friesenecker & Kazepov, 2021, p. 83).

increases in private rents and more pressure on the municipal housing stock (Friesenecker & Litschauer, 2021). This has led to *Wiener Wohnen*, the organization responsible for managing municipal housing, to increasingly focus allocation on more vulnerable and poorer populations. Access to municipal housing is highly contentious, and the far-right party in Austria (which has been gaining vote share in Vienna in recent elections) has harshly criticized the city's allocation procedure and called for municipal housing to again only be granted to Austrian citizens (Essletzbichler & Forcher, 2022; *Wien Regelt Wohnungsvergabe Neu*, 2025). While the social housing system is generally considered stable and has many successful attributes, these recent trends are the background conditions of heightened fragility (Kadi & Lilius, 2024).

4.1.4. Limited-profit Housing Sector

Limited-profit housing associations (LPHAs) are a significant producer of housing in Austria, and in recent decades, they have been the largest producer of social housing in Vienna. While they are not state-owned, these private entities operate under a specific national regulatory regime which dictates how rents are set and what types of activities LPHAs can engage in, carving out a unique "Third Sector" role (Koessl, 2022, pp. 5–6). More specifically, the LPHA business model is governed by the national Limited Profit Housing Act (*Wohnungsgemeinnützigkeitsgesetz*) and other related legislation tied to conduct, cost calculation, accounting rules, and audit regulations. In exchange for complying with these regulations, LPHAs are exempt from paying corporation tax on their core construction and building activities. As private entities, LPHAs can be organized as either cooperatives or limited-liability companies with a broad range of shareholders (public authorities, unions, private businesses, etc.).

The history of limited-profit housing in Austria dates back to the nineteenth century and has roots in the self-help cooperative housing movement; housing built by factory owners to ensure labor availability; and non-profit or charitable organizations (Koessl, 2022). According to Ludl (2007), in the early twentieth century, several laws governed non-profit housing. It was during the period of National Socialism in 1938 that limited profit housing was more comprehensively codified, at which point the "German Limited-Profit Decree and – later – the German Limited Profit Housing Act also gained validity in Austria" (Ludl, 2007, p. 3). Ludl (2007) goes on to describe how, following the defeat of the fascist regime, the Limited Profit Housing Act was passed, which was "cleansed of any provisions containing 'typical National Socialist thought'" (p. 3). ¹⁹ Increasingly, in the post-war era, limited-profit housing ended up comprising a larger

¹⁸ While technically they are referred to as *Gemeinnütziger Bauvereinigungen*, they are also commonly referred to as *Genossenschaften* (cooperatives), despite the fact that not all LPHAs take the cooperative legal structure. ¹⁹ There is very limited discussion on the role of National Socialism on the codification of the Austrian limited-profit sector in the English language literature, nor does this come up in any of the municipal materials, Vienna policy reports, or more recent English publications by the Austrian Federation of Limited-Profit Housing Associations (GBV) that I reviewed for this thesis. As an exception, when discussing the fragmentation of housing legislation and

share of housing production within Austria. In Vienna, for decades, the city has increasingly relied on the limited profit housing sector to produce social housing in the context of minimal private investment in the housing stock.

Hybrid financing is a key aspect of the LPHA model. Public loans are provided by federal state governments, and private banks provide commercial loans. Most public funding is provided via low-interest loans (which operate as a public revolving fund), though some federal states also provide grant funding. Kossel (2022) describes how "the interest rates charged on bank loans [to LPHAs] ... are in general lower than for-profit loans because of the economic stability of LPHAs and the lower risk of vacant stock due to better affordability in the LPHA-sector" (p. 14). In the Austrian capital market situation of 2022, when the report was written, the interest rates issued on bank loans were equal to or sometimes even below interest rates on public loans. LPHAs also use a revolving fund (monies sourced from the capped profit) to help finance new construction using their own equity. This revolving fund is a major aspect of this housing provision model, which creates a "closed circuit" of housing subsidy—surpluses are not paid out to shareholders—and takes a long-term view to promote intergenerational justice (Koessl, 2022, p. 22). Tenants are commonly required to provide a "down payment" at the beginning of their tenancy to help cover the land, construction, and financing costs. The down-payments are returned to tenants after moveout, depreciated by 1% of nominal value every year (Koessl, 2022, p. 17). The tenant downpayment helps reduce the cost of financing LPHA building construction (lowering the amount of debt service in turn lowers operating costs and tenant rent). Figure 5 summarizes the typical financing mix of new construction limited profit housing buildings in Vienna (Koessl, 2022, p. 19).

According to Koessel (2022), rents in the limited-profit housing sector are based on cost-rents, which cover the costs of development (land, financing, and construction costs) as well as operations and maintenance. This means that rents cannot be set above or below the actual costs of operation, although a capped amount of profit can be generated from cost-rents in order to encourage re-investment in housing construction. After loans from public authorities and commercial banks have been repaid, usually in 35-40 years, LPHAs can only charge a flat amount per square meter that is indexed for inflation every two years. During this second phase of cost-rents, following loan repayment, rent levels are typically lowered for tenants. The cost-rent principle embodied in the Limited-Profit Housing Act aims to guarantee that the operations of LPHAs are financially sustainable long-term, while also ensuring rents are not inflated due to

subsidy schemes in Austria, Matznetter (2002) makes mention of how, following World War II, some "German law (such as the Non-Profit Law of 1940)" was carried over into the resurrected Republic of Austria (p. 275) and how "non-profit housing companies, based upon Nazi non-profit legislation, continued and new ones were founded" (p. 280). An Austrian housing expert verbally told me that the National Socialists saw a decentralized cooperative housing sector as a potential threat and sought to centralize its regulation in order to control it more effectively.

profit-seeking. Cost-rents are calculated at the building level, and cross-subsidy between buildings in a LPHA portfolio is not possible. Across Austria, especially in urban areas, tenants of limited-profit housing pay significantly less than those renting in the private rental sector. In urban areas of Austria, the average difference in gross rent (on a per square meter basis) between the for-profit sector and limited-profit sector is a striking 39% (Koessl, 2022, p. 25).

Turning to allocation procedures, limited profit housing is not strongly income-targeted. This is because limited profit housing is envisioned to "ensure quality housing is produced at a moderate price that will meet demand and not inflate wage demands" (Deutsch & Lawson, 2012, p. 12). In practice, the required, sometimes quite large, tenant downpayments that are used to co-finance LPHA development (and returned on move out) impose financial barriers on lower-income households accessing this housing in Vienna (Friesenecker & Kazepov, 2021; Kadi, 2015). This is one factor that has led researchers to observe a growing polarization trend between Vienna's two social housing sectors: the more costly to access limited-profit sector is increasingly populated by middle-class, native-Austrians, and the lower-cost municipal housing sector is increasingly home to low-income residents with a migrant background. The municipality has introduced some mechanisms to address this, such as low-cost loans for households to finance tenant downpayments and requiring additional smaller, more subsidized units (so-called "SMART apartments") in LPHA developments that receive funding. Increasing land costs in Vienna in recent years have also been a factor in driving ballooning tenant downpayment contributions, due to increased competition for land by the private rental sector (Friesenecker & Kazepov, 2021, p. 83).

Table 3: Typical financing mix in Vienna

	Cost per square metre	Total cost for	Share of
	(in Euros)	10,000 square metre	total cost
		development (in Euros)	
Public loan (1%	600	6,000,000	26%
interest, 35 years)			
Bank loan (2.5%	1,335	12,850,000	56%
interest, 30 years)			
LPHA equity	350	3,500,000	15%
Tenant equity	65	650,000	3%
(down payment)			
Total	2,300	23,000,000	100%

Source: estimates based on GBV member survey 2020.

Figure 5 - Example of the typical financing mix for a limited-profit housing development in Vienna. Source: (Koessl, 2022, p. 19)

4.2. United States Welfare and Housing Landscape

United States Welfare System

The United States of America is generally considered to be a strong example of a highly marketoriented, liberal welfare regime and a country that pursues a dualist rental housing system (Esping-Andersen, 1990; Hulse, 2003). Tracking well with the Esping-Andersen (1990) definition of a liberal welfare state, most social welfare policies in the United States strictly target recipients deemed to have either "earned it" via social insurance contributions (e.g. Social Security and Medicare) or provide means-tested welfare benefits for those deemed "in need" (e.g. food assistance, housing vouchers, temporary income supports). Many U.S. social programs impose work requirements on adults deemed capable of working and who are not responsible for any dependent children, and, increasingly, work requirements have also been applied to parents with dependent children. The creation of this "workfare" approach to social welfare was embodied by the neoliberal welfare reform bill passed in 1996—the Personal Responsibility and Work Opportunity Act (Mounk, 2017).²⁰ Relatedly, the distinction between the "deserving" and "undeserving poor" is an important criterion for welfare in the U.S. (Moffitt, 2015). Moreover, structural racism and racialized poverty scaffold and shape discourses of deservingness and stigma towards means-tested welfare system beneficiaries. The term "welfare" is stigmatized in American society and has "[become] a code word for race," especially for Black Americans (Nadasen, 2007, p. 53).

The following are two stylized representations to further contextualize the U.S. welfare system. First, scholars have described the American welfare systems as operating as a "submerged welfare state," describing how substantial amounts of social benefits are provisioned via the tax code, a method that obscures the role of the state and tends to privilege middle- and higher-income households (Mettler, 2010, 2011). Second, the "delegated welfare state" describes the large-scale delegation of public service administration to a wide variety of non-profit social service providers, faith organizations, and other charitable organizations (Morgan & Campbell, 2011). There is a strong policy preference for in-kind vouchers and aid that require households to procure goods or services from private operators. This "delegated welfare state" leads to complicated service provision and administrative burdens for recipients accessing social supports.

United States Housing Landscape

The following are a few data points to give further context to the U.S. housing landscape. First, the United States homeownership rate slightly trails the OECD average, at 66% and 71%

²⁰ The name of the highly restricted cash assistance program that this legislation created also reflects this policy logic: Temporary Assistance for Needy Families (TANF).

respectively, and the U.S. is one of the OECD countries with the largest fraction of homeowners carrying an outstanding mortgage (OECD, 2024c). 21 Second, the United States has a small social housing stock compared to international peers, comprising only 3.6% of the total dwellings versus an OECD average of 7.1% of the housing stock (OECD, 2024a).²² Third, the United States' spending on housing allowances (housing vouchers) at 0.14% of GDP is substantially lower than the wealthiest OECD countries in 2022: see the United Kingdom at 1.38%, Denmark at 0.72%, and Germany at 0.41% (OECD, 2024b). An important limitation of the United States housing voucher program is that it is not considered an "entitlement program," meaning not all who are eligible on an income basis will, in fact, receive it (Kathleen Moore, 2016; Policy Basics, 2015; Sisson, 2025). Since its origin in the 1970s, the federal government has not fully funded the housing voucher program to allow all who qualify on an income basis to receive a voucher. Currently, about 2.3 million renter households are supported by the \$32.8 billion program, but this is only roughly 25 percent of the eligible population, leading to long waitlists and rationing via lotteries. Voucher holders also face discrimination by private landlords and other administrative challenges in making use of the vouchers in the limited time frame provided to search for housing.

Lastly, the aggregate household housing cost burden in the U.S. as a share of disposable income nearly matches the OECD average. But the housing cost burden is strikingly elevated for the poorest U.S. households. The share of cost over-burdened low-income private tenants—those in the bottom income quintile spending more than 40% of income on rent—was 49% in the United States versus an OECD average of 36 percent (OECD, 2024c). In comparison, the figure for Austria was 21.1%.

4.2.1. The Pillars of the "American Model"

The following sections provide a brief overview of the existing U.S. affordable housing sector. Following van Hoffman's (2024) typology, low-income housing programs tend to fall into three categories: 1) direct government ownership (public housing); 2) indirect government support

²¹ This is partially driven by the inclusion of post-socialist Eastern European countries with particularly high homeownership rates stemming from the mass privatization of publicly owned housing stocks in the 1990s following the collapse of state socialism. In 2022, OECD post-socialist countries had homeownership rates ranging from 95% (Romania) to Czechia (74%). When post-socialist countries are removed, the United States homeownership rate is slightly above average the resulting average of 62 percent.

²² For this indicator, the OECD defined "social rental housing" as residential rental accommodation provided at sub-market prices and allocated according to specific rules rather than market mechanisms. When responding to the OECD Questionnaire on Affordable and Social Housing (QuASH) survey, the U.S. Department of Housing and Urban Development defined the United States social housing stock as including "public housing, subsidised units developed through specific programmes targeting the elderly (section 202) and disabled people (section 811), as well as income-restricted units created through the Low-Income Housing Tax Credit (LIHTC) programme; the number of public housing units as well as section 202 and 811 dwellings financed through the LIHTC programme have been adjusted to avoid double-counting."

through subsidies to private nonprofit and for-profit entities (Low-income Housing Tax Credit); and 3) government housing allowances for privately owned market-rate units occupied by low-income tenants (Housing Choice Vouchers) (von Hoffman, 2024). Since the 1980s, the United States housing policy has emphasized funding demand side interventions (subject subsidies) to help individuals access housing in the private rental sector when compared to spending on supply side (object subsidies) to fund the construction of new affordable units (Galster, 1997). Given that most affordable housing programs in the United States are means-tested and targeted towards low-income renters, I will not be discussing the relatively small number of middle-income rental programs in detail.²³ This section focuses on public housing, the Lowincome Housing Tax Credit, and the importance of homeownership in the American housing system.

4.2.2. Public Housing

In the United States context, public housing refers to a specific federal low-rent housing program that was created in 1937.²⁴ It was the first national low-income housing program in the country's history and came from the result of the advocacy of the "public housers" — a loose coalition of social reformers, with varied specific policy ideas. Some of the public housers directly referenced the then-contemporary European social housing experiments of the 1920s and 1930s as inspiration, although the resulting U.S. public housing program diverged from those models in definitive ways (von Hoffman, 2024). Under the public housing program, the federal government subsidized the initial construction and ongoing maintenance of multifamily housing for low-income families.

Currently, there are roughly 800,000 public housing units, which are home to 1.6 million low-income Americans. Public housing residents are disproportionately Black, female, living with a disability, and residing in urban areas (Center on Budget and Policy Priorities, 2024). Though federally funded, quasi-governmental Public Housing Authorities (PHAs) own and manage the properties at the local level. The governance structure of PHAs involves an appointed board of directors, typically chosen by local government officials. Historically, there was minimal tenant

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²³ One U.S. middle-income housing program is frequently pointed to in the social housing discourse: the New York State Limited Profit Housing Companies Law of 1955, more commonly known as Mitchell-Lama. The program offered private developers a combination of low-interest loans, property tax abatements, and cleared land (often tied to urban renewal) in exchange for constructing housing with rents affordable to moderate income households (roughly the middle third of the income distribution). The program included both cooperative apartments and rental housing. More than 100,000 Mitchell-Lama apartments still exist in New York City at substantially below market rates (Tarleton, 2025; "Workforce Housing and Middle-Income Housing Subsidies," 2019). Besides Mitchell-Lama, there are also a variety of "workforce housing" programs targeted at middle-income households, including employer housing for civil servants in high-cost cities are regions where labor is difficult to recruit.

²⁴ While the Wagner-Steagall Housing Act of 1937 created the permanent public housing program in the United States, there were pilots of public housing in the early 1930s within the Housing Division of the Public Works Administration (Radford, 1997).

involvement in decision-making, but currently, PHAs recognize tenant associations with limited formal influence (von Hoffman, 2024, p. 10). At its peak in the mid-1990s, there were roughly 1.4 million units under the program, but after decades of federal disinvestment and underfunding—as well as a bipartisan federal government retreat from the idea of public housing—PHAs demolished or removed tens of thousands of units from their stock in the 1990s and onwards.

Eligibility for public housing

When compared to the other federally funded housing programs, public housing serves the highest proportion of poor people (von Hoffman, 2024, pp. 1–2). Families seeking to access public housing must be "low-income," defined as earning 80% of the area median income (AMI) or below. Similar to the Housing Choice Voucher program (housing allowances), further meanstesting among low-income families is required; at least 40 percent of new families a PHA admits each year must earn 30% AMI or less than the federal poverty line, whichever is higher. Typically, PHAs exceed this requirement and heavily target the bulk of units to the extremely low-income population. Locational decisions for where to cite public housing have historically been a source of immense political controversy, and followed racist segregationist patterns (Hirsch, 2009). Hirsch (2009) also describes how public housing was also used in conjunction with urban renewal to massively reshape urban neighborhoods and "warehouse the poor" displaced by slum clearance activities, with Black residents and other racialized groups bearing the harshest consequences.

Public housing financial structure and funding

The interrelation of the financial structure of U.S. public housing, physical structure deterioration, and residualized tenant populations is critical to understand the program's trajectory. The national housing acts in 1937 and 1949 set forth that, "local housing authorities were expected to use tenant rents to cover all annual operating expenses, including maintenance, repairs, utilities, and management expenses" (Hunt, 2001, p. 114). Even with the lower-income focus, public housing advocates and local housing agencies initially focused on serving more "respectable" tenants from the "submerged middle class" (von Hoffman, 2024, p. 5). Nevertheless, a multitude of factors—including federal regulations that enforced further income targeting, working-class Americans having more housing options, and increasingly dilapidated buildings due to insufficient maintenance—led to public housing serving more and more vulnerable populations. Financially, the reduction in rental income due to the poorer tenant profile also meant that PHAs were increasingly dependent on annual appropriations of operating and capital subsidies from the federal government, which fluctuated and were politically unstable. Federally imposed per-unit cost caps also led to the construction of high-rise buildings with greater density than some PHAs and architects desired, as well as lower-quality

buildings that later had major maintenance issues. Buildings reached crisis levels in the 1980s, but the federal government refused to allocate additional funding.

By the 1990s, the policy consensus on these distressed public housing developments was to demolish "troubled" and "distressed" public housing projects (particularly high-rise projects), and replace them with mixed-income public-private developments that "reduced the concentration of poverty" (von Hoffman, 2024). The expansion of the public housing stock was limited to the unit totals in 1999 via the Faircloth Amendment. In the 2010s, trends of "mixed-finance" continued with the approval of the Rental Assistance Demonstration (RAD) program, which increasingly allowed PHAs to access new sources of funding from private sector entities to finance capital improvements—but in doing so, removed them from the public housing program and into another subsidy pool. ²⁵ Despite some progressive legislators' calls for greater investment in the program, public housing still finds itself in the "dreary deadlock" as coined by Catherine Bauer in 1957, and advocates for public housing estimate the capital fund backlog for maintenance has grown to over \$90 billion in 2025, with thousands of units lost each year due to disrepair (National Low Income Housing Coalition, 2024; Penner, 2018).

4.2.3. The Low-Income Housing Tax Credit

In the context of federal abandonment of the public housing program as a source of new subsidized rental units, the Low-Income Housing Tax Credit has become the largest source of subsidy for new affordable housing construction in the United States (Axel-Lute, 2023; Freemark & Scally, 2023). Created in 1986, this tax incentive program operates through the federal tax code and is administered by the Internal Revenue Service (IRS). A fixed number of tax credits are distributed to state-level housing financing agencies (HFAs)—and certain cities and territories—by population, and HFAs go on to competitively award tax credits to either for-profit or non-profit housing developers that agree to build or rehabilitate housing with regulated rents affordable to low-income households. Developers must then sell the tax credits to private investors who can use them to reduce their federal tax liability. The proceeds of this tax credit sale are then used to finance the affordable development. LIHTC has been modified multiple times since it was originally enacted and has contributed to the financing of over 3.5 million units of affordable housing (Tax Policy Center, 2024).

²⁵ There is on-going contestation about the merits of the RAD program and whether it constitutes the "privatization" of public housing.

 ²⁶ Jurisdictions use a Qualified Allocation Plan (QAP) to select projects to fund with LIHTC, and this is a key policy tool states can use to set additional priorities and requirements above those set by the federal government.
 ²⁷ While LIHTC developers themselves can make use of the tax credit, most do not have sufficient taxable income, which necessitates seeking out private investors with significant tax liability. The process of assembling and selling tax credits to private investors is complicated and often facilitated by "syndicators," who help broker connections between LIHTC developers and investors as well as pool multiple projects into a LIHTC equity fund (for a fee).

Eligibility for LIHTC-funded affordable housing

Access to a LIHTC unit is means-tested, and eligibility is generally based on household income as a percentage of AMI (Corianne Payton Scally et al., 2018). There are multiple avenues for an affordable development to qualify for the LIHTC subsidy: 1) a minimum of 40 percent of units must be occupied by tenants with an income of 60% AMI or below; 2) a minimum of 20 percent of units must be priced at rents of 50% AMI or below; 3) income-averaging can be used to the first affordability term, as long as no units are occupied by tenants with incomes above 80% AMI.²⁸ Due to the income requirements, property management is required to annually check the incomes of all tenants to ensure the inhabitants continue to meet the income eligibility rules. If housing developments fall out of regulatory compliance, investors in the project can lose their tax benefit.

The convoluted financing of LIHTC projects

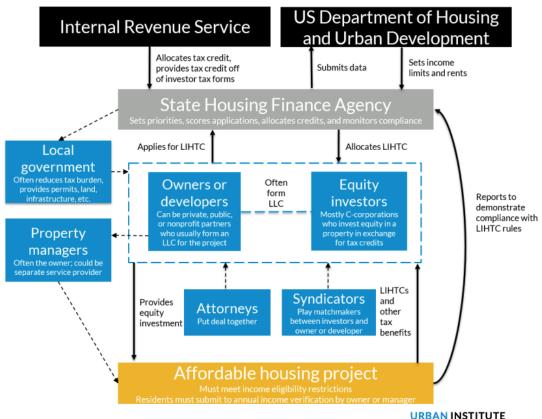
There is no one financing model of a LIHTC project, as these funds are often co-mingled with other funding sources because the subsidy LIHTC provides is typically insufficient to fully fund a development. See Figure 6 for an overview of the multitude of partners involved in a LIHTC public-private partnership deal. This complicated financing means that individual developments have financing from multiple sources that each have different requirements for household income, reporting, compliance, and more. Unlike public housing, the affordability term of LIHTC lasts for only 30 years of affordability, after which point the legal restrictions on rent levels expire (some states impose longer requirements). The built-in expiration of LIHTC affordability terms is one of the most heavily critiqued aspects of the program (Axel-Lute, 2023). LIHTC property owners generally have four options once the affordability requirements expire: 1) Convert subsidized units to market-rate rents; 2) Apply for additional tax credits that would establish new affordability requirements; 3) Voluntarily maintain their affordable homes; 4) Sell the property (Francis Torres, 2023). Given the up-front nature of the equity subsidy investors provide, the absence of ongoing operating subsidy, and the fact that rents from tenants are too low to support ongoing operations and maintenance, some owners at the end of the affordability period preside over buildings in financial and physical distress. As a result, they must go through a "recapitalization" process of seeking additional public subsidies to invest in rehabilitation and avoid a distress spiral.²⁹ An estimated 500,000 current LIHTC units (about a

²⁸ In order to make their project proposals more competitive and eligible for additional funding, most developers set 100 percent of units at LIHTC affordability levels. Developers can also promise to set rents even more affordable than these federal regulatory minimums to gain an advantage in the QAP allocation process.

²⁹ There are also called "preservation deals" as the public body either refinances the housing developments or allocates additional subsidies to preserve affordability for another set of years (von Hoffman, 2016, pp. 5–6).

quarter of the total stock) will reach the 30-year mark by 2030, leading to growing preservation concerns for this affordable housing stock. (Corianne Payton Scally et al., 2018, p. 5)





Note: Each color denotes one of the four layers of a LIHTC deal: the federal government (black), the states (gray), the project developers (blue), and the project itself (yellow). Solid lines indicate a component common to all LIHTC projects; dotted lines indicate more complex partnerships that may or may not exist depending on how the deal is structured.

Figure 6 - The many partners in a LIHTC deal. Source: (Corianne Payton Scally et al., 2018, p. 5)

4.2.4. Homeownership

The centrality of homeownership to the American housing system, political ideology, and welfare state is a major piece of the country's welfare and housing landscape. Homeownership is the predominant housing tenure among American households; the homeownership rate among households was 65.6% in the first quarter of 2025 (Joint Center for Housing Studies of Harvard University, 2025). Various scholars have written about how homeownership in the U.S. was elevated to a privileged status (and tenancy degraded) in the political, social, and economic spheres of life—describing how despite challenges and serial crises, "the ideology of home ownership" remains the dominant housing ideology (Kemeny, 1981; Arundel & Ronald, 2021; Fikse & Aalbers, 2021). Homeownership is understood to be a manifestation of the so-called

"American Dream," and property ownership mediates who has a legitimate claim to citizenship, dating back to the settler colonial founding of the country (Brown & Carbone, 2021). Homeownership and individual property ownership have been valorized discursively and materially throughout U.S. history, but especially following World War 2.³⁰ During this period, political leaders heavily promoted the creation of a homeownership society via the government-backed financial architecture of 30-year fixed-rate mortgages and government guarantees to expand access to credit; exclusionary single-family zoning and large-scale highway infrastructure to urban peripheries; and large tax advantages for homeownership, such as mortgage interest deductions and absence of taxes on owner-occupier imputed rent (Fetter, 2014). These factors all came together to fuel a suburban expansion and a notable increase in homeownership rates between 1940 and 1960, from 44 to 62%.

Lastly, the centrality of homeownership to wealth building and a self-help asset-based welfare system is critical. As Dolin and Ronald (2010) outline, the asset-based approach to welfare is premised on replacing a reliance on state social transfers to manage the risk of poverty with more individual responsibility over welfare needs through an accumulation of appreciating investments (Doling & Ronald, 2010, p. 165). Individuals can then, in theory, liquidate their assets during low-income periods later to supplement consumption and welfare needs (e.g., retirement). In this broadly accepted paradigm, the homeownership tenure is not just the preferred type of shelter but also a critical pillar of the welfare system—a platform to finance retirement, children's education, medical emergencies, and more. For most Americans, their home is their largest asset and a main source of wealth (as well as wealth inequality). Wealth and home equity gaps are highly racialized and spatially structured—reflecting ongoing patterns of residential segregation in America. As a result, policy debates on this asset-based welfare terrain surrounding how to "close the wealth gap," and more specifically, racial wealth gaps, often seamlessly become policy discussions about "closing homeownership gaps" and expanding access to homeownership for marginalized groups (Choi & Zinn, 2024; NAACP, 2022).31

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³⁰ Infamously, the 1926 U.S. Supreme Court ruling upholding the constitutionality of local zoning ordinances portrayed zoning as a tool to protect the sanctity of single-family detached residential districts and went on to disparage apartment houses as "mere parasites" taking advantage of the former's "residential character" (Neufville & Barton, 1987).

³¹ Despite the hegemonic nature of this ideology, the faith in and emphasis on expanded homeownership as a pathway to social equality has not gone without critique (Axel-Lute, 2022a). Scholars have described how differences in homeownership rates are just part of the story of wealth gaps, and that even among those who own their homes, significant (racial) wealth gaps remain. The lower perceived desirability of Black or Brown neighborhoods among the majority of (white) homebuyers also leads to inequities in home valuation and racism within the home appraisal process (Choi et al., 2019). Homeownership also ties into constellations of related racial and class inequities in property tax assessment, credit scores, home lending & insurance, public services, and more. Lastly, homes are expensive to maintain, can require significant capital outlays, and necessitate a stable income to build equity. Years must pass before the benefits can accrue, and racialized and marginalized population

Going back to arguments Kemeny and others have advanced, the societal investment in the tenure of homeownership discourages the investment in other aspects of the welfare state, such as the pension system and, particularly, social housing rentals. Doling and Ronald (2010) describe how "housing-asset-based welfare is founded on the assumption that house prices increase faster than inflation, and in perpetuity," and critics of this asset inflation regime connect it to the commodification and financialization of housing. (Axel-Lute, 2022b; Doling & Ronald, 2010, p. 169). This also leads to a distinct generational divide regarding housing asset inflation, as the "outsiders" to the market are commonly younger adults in the private rental sector, and the "insiders" are disproportionately older adults who are owner-occupiers. Lastly, the emphasis on homeownership in the United States has been paired with a de-emphasis on tenant protections and tenancy rights and legal protections (Schindler & Zale, 2023). The United States lacks any national rent control, and national tenant protections are limited to isolated areas, such as fair housing laws related to preventing discrimination on that basis. Entering this gap, individual states and cities have their own tenancy legal regimes that can vary widely.

5. Assembage and Promotion of the "Vienna Model" of Social Housing

5.1. Historical Promotion of the Red Vienna Municipal Housing Program

Dating back to the origins of Vienna's radical experiments in municipal socialism, there has long been international interest in the city's housing programs as well as active self-promotion by municipal leadership. Scholars of Red Vienna have analyzed the municipality's communication strategy, describing how the "city's active advertising campaigns sought to reach both an international socialist audience and a wider bourgeois public" as well as seeking to bolster domestic constituencies and the local voting base (Schwarz, 2019, p. 587). These large-scale educational campaigns were not limited to mass housing but also touched other political areas like education. Brochures were printed in multiple languages to be distributed to socialist

are systematically disadvantaged when it comes to benefiting from homeownership. Research does suggest homeownership *can* increase wealth for individual low-income homeowners, though a nontrivial number are made worse off if they fail to sustain ownership and go into foreclosure. However, as Axel-Lute (2022) observes, "with lower rates of homeownership, Black households are disproportionately likely to be renters and therefore harmed by the rising property values that are generating that wealth for homeowners."

³² With commodification—itself coming from a political economy tradition—referring to the privileging of housing as an investment vehicle and something to be speculated over, rather than a source of shelter. The related concept of financialization refers to the increased dominance of financial markets in the housing sector. The usage of both terms has generated substantial debate pertaining to definitions, overuse, and conceptual imprecision (Axel-Lute, 2022b; Fields, 2017; Hall, 2023).

parties abroad; strategic dissemination centers like the Social and Economic Museum (*Gesellschafts- und Wirtschaftsmuseum*) were created; and the city hosted large-scale events, such as the International Housing and Town Planning Congress of 1926 and an International Socialist Youth Meeting in 1929. These campaigns, institutions, and structures can also all be read as the "informational infrastructure" of Red Vienna policy mobility (McCann, 2011, p. 120).

Furthermore, Schwartz (2019) argues that the increasingly professionalized and extensive efforts to promote Vienna as a "model city" were primarily focused on attaining international acclaim in the service of securing domestic legitimacy—especially during the late 1920s, amidst heightened economic crisis and intense conflicts with National Socialists. One striking example was the 1930 propaganda film funded by the Social Democratic Workers' Party, *Das Notizbuch des Mr. Pim (Mr. Pim's Trip to Europe)*. Directed by Frank Ward Rossak, the film centered its narrative on showcasing Vienna as a model to the world. Viewers follow a wealthy American expatriate, a "diehard capitalist," as he is taken on a tour of the grand achievement of Red Vienna, guided by his daughter and her Austrian husband. Ultimately, the young couple "shows Mr. Pim the many ways that Vienna has been transformed from a city of poverty and misery into a modern, organized, and prosperous city ... and he is gradually converted into a supporter of the Social Democratic government" (Rob McFarland, 2019, p. 570).

Marcuse (1985) narrates how Red Vienna's achievements were "hailed all over the world" by the international housing community as a "harbinger of a better world," and how Red Vienna hosted delegations of visitors from around the globe (p. 208). At the same time, it is also important to acknowledge the existence of contemporary critics of Red Vienna and the housing program's "gap between the general commendation and objective fact" (Marcuse, 1985, p. 213). Skeptics criticized the municipal developments for insufficient interior space, poor locations, limited transportation connections, and technological backwardness in architecture and construction. Schwartz (2019) also mentions that the international reception of Vienna's municipal housing program was uneven and varied over time, highlighting how the "first big chance to present its own status as a model city at the 1926 International Residential Building and City Planning Congress in Vienna" led to reactions that were "unexpectedly disappointing" (p. 588). Most of the architects and city planners who visited Vienna in 1926 critiqued the decision to construct dense, multistory housing within the existing urban fabric, rather than the then-in-vogue idea of low-density, garden city-inspired settlements sited in the city periphery. However, as time progressed, the assessments of Vienna became more positive, even if most mainstream housing observers were still reluctant to fully embrace Vienna as a model city.

5.2. Interwar American Observers of European and Viennese Social Housing

During the 1930s, several observers from the United States traveled across the Atlantic to study the exciting housing experiments across interwar Europe, including the housing program of Red Vienna. These travels—and the observers' subsequent information dissemination—were an important source of policy knowledge circulation and policy movement. To historicize the uptake of the "Vienna Model," I will describe the actions of Charles O. Hardy, an economist affiliated with a Washington, D.C., think tank; Catherine Bauer, a prominent housing reformer and advocate of public housing; and Leo Kryzski, a radical union official in Philadelphia.

The case of Charles O. Hardy and The Housing Program of the City of Vienna

In 1934, writing on behalf of the Institute of Economics of the Brookings Institution³³, the economist Charles O. Hardy published the book The Housing Program of the City of Vienna, summarizing Vienna's housing initiatives. He was heavily assisted by Dr. Robert R. Kuczynski, a German economist and demographer aligned with left-wing causes and workers' rights (Kuczynski, 2015). The bulk of the book is a thorough description of the Red Vienna housing program, including the dire background conditions, and Hardy credited the city with a competent execution of their objectives. Throughout the book, Hardy took pains to acknowledge the differences with the U.S. context, stating, "it may be worth while to remind American readers that the whole housing problem is very different in a community which lacks the equipment of automobiles and radios which is characteristic of American cities" (Charles O. Hardy, 1934, p. 107). In another instance, Hardy noted Vienna's municipal apartments were very small by American standards (units lacking central heating, bath facilities, or elevators), though in Viennese terms they were significant improvements to typical pre-World War I units. Ultimately, Harvey disagreed with the Red Vienna political vision that housing should be provided as a public good and instead suggested only the "customary" cases of education, street construction, and policing should follow this path.

The case of Catherine Bauer and Modern Housing

Catherine Bauer was an American writer and housing intellectual who played an important role in popularizing noncommercial housing and had a significant impact during the New Deal era on the development of the U.S. public housing system in the 1930s (Radford, 1997). Her 1934 book, *Modern Housing*, described European housing programs for an American audience, informed by her travels in Sweden, the Netherlands, France, and Germany. From this

³³ The Brookings Institution was (and remains to this day) a prominent mainstream American think tank based in Washington, D.C.

experience, she called for a system of "Modern Housing": the provisioning of housing on a limited or non-profit basis outside the speculative market; utilizing modern architectural building designs; and comprehensive neighborhood planning with nearby parks, schools, and community facilities.

On the question of how modern housing could be institutionalized in the United States, "[Bauer's] basic argument was that housing at its core was a political issue, not a technical one, and certainly not an area of life where gradual improvement could be expected to occur naturally in a capitalist society." She argued Modern Housing would only come to be via political pressure and militancy from below rather than intellectual and political proposals from top down (Radford, 1997, pp. 79–81). Her book was influential and overall well-received by critics hungry for a new approach. Despite Bauer's clear enthusiasm for the necessity and possibility of learning from European models, many reviewers "were unhappy with what they felt was a lack of attention to—even an alienation from—American realities." Radford quotes a critic who complained housing theorists like Bauer "should try to take us as we are" and stop trying to "[turn] us into Europeans" (Radford, 1997, p. 81)

Radford (1997), while quite sympathetic to Bauer, also noted how, "in some respect, [Bauer] misread what happened in Europe" (p. 82) First, Bauer overstated the degree working-class groups in Europe directly pushed for the avant-garde, modernist architecture she reported on approvingly, and the more circuitous process by which pressure from below was channeled into mass housing. Secondly, Radford argues that Bauer's analysis suffered from underestimating the importance of institutional factors that led to the creation of social housing sectors in Europe. Specifically, the more limited power of local real estate interests in most European countries in comparison to the United States, where property investors were more powerful and deeply embedded with other sectors of the economy and political structure.

Historical disagreements over the replicability of European models in the U.S.

Some observers, like Hardy, underlined the exceptional character of Vienna's housing circumstances and context, which implied less relevance for other contexts. As Hardy put it, "the housing program of Vienna was a development out of specific housing conditions, tax policies, building regulations, wartime adjustments, and class controversies, most of which were peculiar to Vienna" (Charles O. Hardy, 1934, p. 116). Hardy expressed doubt that municipal officials interested in such a program would have the zeal for public interest and the administrative competency as the Social Democrats that governed Vienna.

Others with a stronger ideological commitment to the project of mass shelter were more optimistic about replication. Leo Kryzski, a dedicated radical who had worked for socialist administrations in Milwaukee, Wisconsin, visited Red Vienna in the late 1920s and observed the

numerous apartments the city's government had constructed, including the iconic Karl Marx Hof. Radford (1997) recounts how he helped introduced European social housing ideas and architectural designs to union leaders in Philadelphia who exploring limited-profit housing: "Kryzski had taken many photographs of the complex [Karl Marx Hof], and that "at the drop of the word 'housing,' [he] would bring them out and deliver a spirited lecture on the feasibility of Americans emulating the Austrians" (pp. 111–112).

5.3. Exhibiting the "Vienna Model" in the 21st Century

The Vienna Model: Housing for the 21st Century City Traveling Exhibition

A key mechanism for circulating the "Vienna Model" in the 2010s was a traveling exhibition, "The Vienna Model: Housing for the 21st Century City," which debuted in 2013 at the Austria Cultural Forum in New York City (See Figure 7). The exhibition showcased the City of Vienna's "extraordinary achievements in public housing since 2007" for an American audience.

Architecture and urban design were a key focus, featuring 36 case studies of Viennese public housing that spanned rehabilitating buildings to new neighborhoods constructed on brownfield sites. Diagrams emphasized the unique breadth of Vienna's social housing stock, the role of government intervention in housing provision, and drew a direct connection between Vienna's housing model and its high place on "world's most livable city" rankings. The City of Vienna was deeply involved in the making of the exhibition, as one of the co-curators on the trans-national team was Viennese housing researcher Wolfgang Förester, who established, and at the time led, the municipality's Housing Research Department. The second curator, William Menking, was an American based in New York City, where he worked as an architectural historian and educator. Together, the curators published a book, also titled *The Vienna Model*, that was published alongside the exhibition and eventually resulted in a second edition.³⁴

The curation of *The Vienna Model* exhibition was specifically targeted to an American audience, beginning with New Yorkers. In an essay, Menking (2024) noted how "the tremendous demand this exhibit has created with the American public ... reaffirms how Vienna is still a vital case study for America if it wants to solve its housing crises and create more equitable, healthy, and livable cities" (p. 45). Aside from New York, the exhibit traveled to other North American and European cities, much of the content staying the same, besides some minor adjustments to reflect the host city's housing conditions.

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³⁴ A second edition was released in 2018, titled *The Vienna Model 2: Housing for the Twenty-First Century,* with an expanded selection of social housing projects in Vienna, as well as essays examining housing policy developments in Europe, North America, and Asia.

The exhibit generated a favorable U.S. reception in 2013, leading to glowing journalistic write-ups such as "Vienna Proves Just How Beautiful Public Housing Can Be" and "Vienna Offers Affordable and Luxurious Housing [emphasis in original]" (Katherine Brooks, 2013; Peteritas, 2013). Some journalists even explicitly encouraged American cities to send study delegations to Vienna: "If de Blasio is serious about making New York not just pleasant but just, he ought to go on a scouting trip to Vienna, where housing is considered a social good, not primarily a financial tool" (Justin Davidson, 2014). One article ended on a more pessimistic note and hinted at the complexities of policy mobility: "Still, despite being an advocate for the system, Förster is skeptical that it could take hold in the U.S. or even in cities in other countries ... 'You cannot just duplicate this. Vienna has a long continuity'" (Peteritas, 2013).

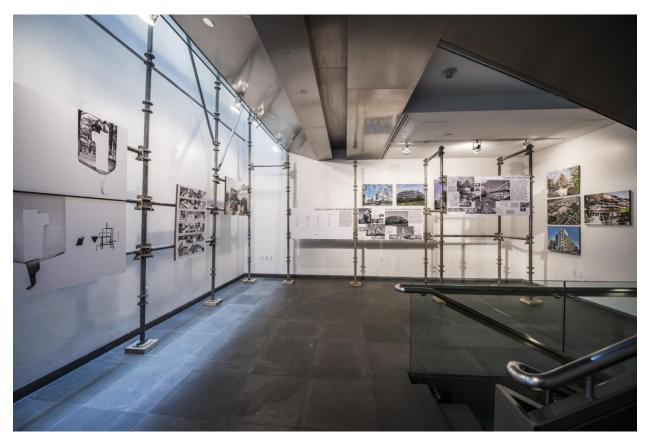


Figure 7 - The Vienna Model exhibit at the Austrian Cultural Forum in 2013. Source: ("THE VIENNA MODEL | April 17 – September 2, 2013," n.d.)

IBA_Wien: New Social Housing

An inflection point for the increased international circulation of a "Vienna Model" of social housing was *IBA_Wien: New Social Housing*, an exhibition put on by the City of Vienna from 2016 to 2022 (See Figure 8). The IBA was conceived by city leadership as an opportunity to showcase the historical and contemporary achievements of Vienna's social housing as well as consider new challenges and innovative futures (*IBA_Wien*, 2022). The *Internationale*

Bauausstellung (International Building Exhibition), otherwise abbreviated as IBA, is a primarily German tradition of building exhibitions dating back to the 19th century, when it was a common format to present building technology innovations to an international public. According to Shay (2012), while IBAs vary in execution, their constitutive elements include an international orientation, beyond local audiences, as well as a focus on presenting "models of the city of the future" (Shay, 2012, p. 11)

Multiple narrative threads can be observed in the voluminous resources produced by IBA Wien concerning the "Vienna Model" of social housing and its positioning. First, Vienna's unique and lengthy historical legacy of social housing is emphasized, alongside the international validation of the contemporary housing program. The preface to the memo outlining the framework of IBA Wien explicitly mentions Vienna's "world-wide reputation" for subsidized housing and how elements of the city's housing policies have been listed as "best practices" by United Nations agencies (IBA_Wien, 2017, p. 5). Second, international knowledge exchange was a major theme of IBA_Wien, referring both to the aim of sharing Vienna's "special expertise" on social housing with international partners as well as enabling the city to inform itself of innovative solutions from abroad. The process of making Vienna a "capital of social housing" also led to support of academic collaborations on social housing and critical housing research (IBA Wien, 2017, p. 12). The IBA ResearchLab was created with a goal of broadening transdisciplinary research among actors in Viennese housing production. Its successor, the Research Center for New Social Housing, "supports critical housing research ... and promotes the international visibility and networking of Viennese housing research" (New Social Housing - Future.Lab, n.d.). 35 A key avenue of this academic networking is through the hosting of international summer schools on social housing for early-career scholars, practitioners, and activists, which have been held annually since 2018.

Finally, the IBA initiative "Corresponding Cities" also laid the groundwork for closer international collaboration and sharing of knowledge about Vienna as a "model city." The network of partner cities included: Barcelona, Berlin, Cologne, Dublin, Munich, Stuttgart, and Vancouver (IBA_Wien, n.d.). This investment in the IBA_Wien informational infrastructure for international relations is important to consider when understanding the continued growth of the Vienna Model's popularity. Two staff members who managed the IBA_Wien transitioned to working for the municipality after the IBA concluded in 2022, creating a small division in the MA 50 housing department called Strategic Projects and International Affairs. In this role, they continue to seek to institutionalize some of the innovative approaches IBA incubated into the city, and are a frequent resource for visiting international study delegations and journalists requesting information (Interviewee 1).

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³⁵ I was a graduate research intern at the Research Center for New Social Housing during the thesis writing process.

The *IBA_Wien* even made itself into some American commentary. A 2018 article by a Los Angeles architect and urbanist (originally from Vienna) calling for an IBA in Los Angeles, included the aside: "The IBA in Vienna is under way right now to specifically demonstrate how to solve a housing crisis ... Could we find ways to use their lessons here in our own city?" (Gerhard W. Mayer & Lindsay Sturman, 2018; *Sustainable Materials in Urban Construction*, 2025).



Figure 8 - Photo of an IBA_Wien event. Source: IBA_Wien New Social Housing

5.4. The "Vienna Tourism Industrial Complex": U.S. Social Housing Policy Tourism

Recently, a growing number of left-leaning housing officials and advocates in the United States have been looking to Vienna as a source of inspiration. Evidence of this trend is seen in the multiple U.S. cities and states (e.g. New York City and Chicago, California and Hawaii) that have sent housing delegations to Vienna since 2019 (DeVann, 2022; Engleman, 2024; Lang, 2024; Lee & Chang, 2023); effusive articles in the media like the lengthy *New York Times Magazine* piece "Lessons from a Renter's Utopia" (Dreier, 2018; Mari, 2023); and think tank policy reports

arguing for the U.S. to adopt the social housing policies of international locales like Vienna (Daniel Aldana Cohen et al., 2025; Gowan & Cooper, 2018). State and local legislators in California and New York have begun introducing bills that would create agencies and secure funding to build social housing, with uneven legislative success thus far (Moore et al., 2024; Schindler, 2025; Zaveri, 2024). Novel models of government-owned mixed-income housing, sometimes called "social housing" by commentators, have also been launched in U.S. jurisdictions in recent years (Dougherty, 2023; Engleman, 2024).

Journalistic coverage of the Vienna Model in the U.S. (and quotes from social housing advocates citing Vienna as inspiration) is an important mechanism for its growing influence. One of the most prominent articles in this genre was the New York Times Magazine piece, Lessons from a Renter's Utopia (Mari, 2023). The lengthy article offered an attractive imaginary of what an alternative future for American housing might look like, showcasing striking statistics on Viennese housing affordability—as well as stunning photographs of social housing architecture, rooftop pools, and lush communal green spaces (See Figure 9, Figure 10, Figure 11).³⁶ The New York Times piece and other articles provide an abridged history of Vienna's social housing, with prominent mention of the depth of the housing crisis after World War I, the triumphs of Red Vienna, and portray the system as more or less continuous in its growth and success for the last 100 years. Other elements mentioned include the expansive tenant protections in Austria, the mixed-income profiles of social housing residents, and the broader sense of ownership tenants have over their homes in Vienna compared to the U.S. This all drives home a message that socially run housing can be both affordable, secure, and luxurious. Furthermore, in an American context where homeownership is synonymous with the "American Dream," renting is presented as just as advantageous as homeownership in Vienna.

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³⁶ Some examples of affordable rents presented are unrepresentative of the typical housing situation in Vienna but paint a vivid impression. For example, describing a couple living in municipal housing whose rent amounted to only 3.6% of their combined incomes.



Imagine a Renters' Utopia.



It Might Look Like Vienna.

Figure 9 - Depiction of one of the rooftop pools of the Alt-Erlaa limited-profit housing development. Source: New York Times Magazine



Figure 10 - Depiction of the Karl-Marx-Hof, an iconic municipal housing development dating back to the Red Vienna period. Source: New York Times Magazine



Gleis21, a co-housing project in Vienna. Luca Locatelli for The New York Times

Figure 11 - Depiction of Gleis21, a co-housing project in the Sonnwendviertel redevelopment area. Source: New York Times Magazine

A key element of the policy mobilization of the "Vienna Model" to the United States has been a growing trend of study delegations to Vienna itself, focused on social housing. These Vienna delegations typically last approximately one week and range from highly professionalized and curated experiences to scrappy, do-it-yourself efforts. Attendees hear presentations from representatives of different municipal government housing institutions, listen to panel discussions featuring different Vienna housing experts, and tour social housing buildings and redevelopment sites. A City of Vienna Housing Department official focused on international affairs had the following comment on their role:

"We also meet a lot of people coming from many different cities, many countries, and teach them the Viennese model, but, you know, teach them the way to understand it, so they can take parts of it, or they can try to implement it in their own context, so not to copy it ... but to teach them the understanding ... and the ideology of it. The ideology is very simple, it's just that housing is a human right." (Interviewee 1)

The Vienna Study Delegation Landscape

While social housing discourse was burgeoning in the United States from the early 2010s, the next leap forward came from a string of Vienna study delegations beginning in 2022, according to my document analysis (See Table 3).

Geography	Dates	Organizer	Organizer Description
	First delegation,		Consultants
	September 2022.		
	Total of 6 delegations		
	completed since		
California	2022, with 7th	Global Policy	
(State-level and	planned for	Leadership Academy	
various cities)	September 2025	(GPLA)	
		Housing Justice for	Advocates and activists
New York State		All coalition, The	
& New York City	October 2022	Action Lab	
		Global Policy	Consultants
Hawaii	2023	Leadership Academy	
Seattle	August 2024	House Our Neighbors	Advocates and activists
		PowerSwitch Action,	Advocates and activists
Chicago	April 2024	IL Green New Deal	
		Fifth Element,	Advocates and activists
		Oregon Housing	
		Alliance, and Beatriz	
Portland	September 2025	Stambuk-Torres	

Table 3 - Provisional list of Vienna social housing study delegations from the United States, Source: (Emily Gallagher [@EmilyAssembly], 2022b; House our Neighbors, n.d.; IL Green New Deal Coalition, 2024; Lee & Chang, 2023, 2023; Oregonian/OregonLive, 2025; senchang1, 2023)

The Global Policy Leadership Academy (GPLA), affiliated with the consulting firm LeSar Development Consultants, is by far the most prominent of the Vienna Social Housing Delegation organizers (See Figure 14 and Figure 15). As of May 2025, they have led six "Vienna Social Housing Field Study" visits and are scheduled to host their seventh in September 2025 (Practice, 2024).

The GPLA program was initially developed by a team led by Helmi Hisserich, the former Director of International Policy Education. Hisserich previously had a long career working in housing policy, including serving as the Director of Housing Strategies & Services in the City of Los Angeles Housing Department. GPLA regularly publishes online content about ongoing U.S. social housing policy efforts and relates them to upcoming study delegations. The connection

between the journalistic accounts and Vienna study delegations is clear from a LeSar consulting blog post:

"LeSar's Global Policy Leadership Academy Vienna program takes housing policymakers, practitioners, and leaders into the field to learn international best practices from Vienna's approach to social housing. The Vienna model of social housing that was recently highlighted as a 'renter's utopia' by the New York Times" (Practice, 2024).

Policymakers involved in significant social housing policymaking have also been connected to GPLA delegations. As well as former GPLA staff members themselves, as of February 2024, Helmi Hisserich is now the Director of the Housing Bureau for the City of Portland, Oregon (City of Portland, 2023). Following a unanimous city council resolution in April 2025, Portland's Housing Bureau has been directed to undertake a Social Housing Study that will examine "social housing models in places like Seattle, Vienna, and Montgomery County, Maryland," and "Portland aims to learn from best practices and adapt them to local contexts" (City of Portland, 2025). Furthermore, there is a planned September 2025 Portland study delegation to Vienna, including three city councilors and six city hall staff (Oregonian/OregonLive, 2025).

5.4.1. Vienna Study Delegation Components

Composition of study delegations and accessibility

Though the make-up of the study delegation depends on the organizers, they typically include a mix of elected officials, housing advocates, and housing practitioners.³⁷ Attendees also have diverse professional backgrounds, whether in urban planning, architecture, finance, or legal advocacy. While most Vienna study delegations are organized around a geography, such as a group coming from a single city or state, some delegations have participants from across the United States. Given the cost to attend and limited resources, interviewees involved in organizing delegations described a deliberative selection process to create a built-in group of supporters passionate about social housing for future campaigns. Funding to attend can come from philanthropy, employers, or self-funding. A few study delegations have also had journalists embedded within them, which can significantly amplify the spread of Vienna Model ideas. Francesca Mari (2023), author of the popular *New York Times* article on Vienna social housing, Lessons From a Renter's Utopia, mentions in the piece joining the 2022 New York delegation.

Some study delegations, such as the consultant-run Global Policy Leadership Academy (GPLA), have significant costs for participation. In 2025, the one-week GPLA Vienna Social Housing Field Study Cost \$7,800 per individual (excluding airfare) (GPLA, n.d.). The question of cost, access, and the commodification of knowledge about decommodifed housing came up with more than

³⁷ Tenant activist groups tend to be more likely to invite unhoused individuals or residents of U.S. public housing.

one interviewee, especially when some of the social housing delegations are provided by for-profit consultancies. One interviewee explicitly mentioned having looked at the GPLA program but was unable to join a delegation after seeing the cost (Interviewee 7). Instead, they prepared their own social housing delegation on a limited budget by directly reaching out to various Vienna housing actors. At times, the cost to attend Vienna study delegations can be covered via scholarships, but this is a case-by-case situation across study delegations and contingent on philanthropic funding and organizer priorities.

Vienna study delegation agendas and learning curriculum

The content of study delegations consists of visits to the offices of different housing institutions for informational presentations; panel discussions with academics, housing experts, and sometimes social housing residents; and extensive walking tours of the different representative and iconic social housing developments and neighborhoods that aim to help communicate elements of the Vienna Model. Delegation organizers also describe having a clear vision of the takeaways they want attendees to get a grasp of and structure the delegations accordingly (Interviewee 3). This curation in Vienna reflects what scholars of the policy tourism literature have found in other contexts, like Barcelona or Vancouver (González, 2011; K. Ward, 2011)

For example, nearly all study delegations take journeys to certain architectural superstructures. *Karl-Marx-Hof,* the kilometer-long political symbol, is the site to learn about the radical origins of the municipal housing program and visit the Red Vienna museum within the complex (See Figure 12, Figure 13, Figure 14) *Alt-Erlaa,* the retro-futuristic high-rise—with rooftop swimming pools on top of 27 stories—helps communicate the idea that mass housing can be integrated with well-designed and luxurious community facilities, especially when compared to Americans' low expectations of what non-market housing can be. Walking tours of compact and transit-oriented urban redevelopment sites showcase how public land can be leveraged for housing. The infill development of *Sonnwendviertel*, on the land of a former railway, presents innovative examples of housing co-operatives (*Baugruppe*). *Seestadt Aspern* is a prime example of the potential of long-range planning to construct a compact, transit-oriented, and sustainable urban development project on the grounds of a former airport at the city's outskirts.

However, a critical examination of these agendas should also consider what sites are left out. By showcasing the most exemplary instances of social housing in Vienna, the problematic developments or simply ordinary developments are excluded, contributing to the unrepresentative aspects of policy tourism that have been described in the literature (González, 2011; K. Ward, 2011). Nevertheless, some study delegations do make attempts to communicate the challenges of social housing in Vienna, such as including panels on racism in Austria, the tensions of "social mix" and gentrification pressures, or walking tours led by Viennese critical housing researchers.



Figure 12 - IL Green New Deal Vienna study delegation with City of Chicago officials at Karl-Marx-Hof. Source: IL Green New Deal Coalition, 2024



Figure 13 - New York delegation attendee's social media post of Karl-Marx-Hof tour. Source: X, @EmilyAssemby



Figure 14 - Global Policy Leadership Academy delegation at Karl-Marx-Hof. Source: GPLA/(Lee & Change, 2023)



ABOUT US ▼ VIENNA SOCIAL HOUSING FIELD STUDY ▼ EXPLORE COURSES ▼ COMMUNITIES OF PRACTICE

UPCOMING VIENNA SOCIAL HOUSING FIELD STUDY TRIPS

FALL 2025: September 21 - 27, 2025

GPLA's Vienna Social Housing Field Study

International best practices in mixed-income housing

The Global Policy Leadership Academy (GPLA) is offering a series of intensive housing policy field studies designed to give carefully curated cohorts of local and regional housing policy leaders, practitioners, and changemakers a deep understanding of the Vienna social housing model and how it came to be the most livable city in the world.



What to Expect

Program participants will learn from and engage with GPLA key faculty and a wide diversity of Viennese housing experts to gain firsthand knowledge about this proven model of social housing. Key topics include urban planning, construction, financing, land management, and community engagement.

Vienna Solved its Housing Crisis

1918: 30,000 Homeless

2022: Most Livable City



Vienna's Approach to Housing Housing is a Human Right

Proactive Public Land Strategy (Land Banking)

- Financing
 - €450MM Permanent Source of Funding
 - Good Financing Model
 Cost-based Financing

 Limited Profit Housin
- Mixed Income Housing

 Social housing includes middle income families
- Single point entry system
- Integrated System linking Stability, Wealth Generation, Innovation, and Sustainability
 - Tenant Protections
 - One-Time Income Certification (upon entry)
 Right to Purchase path to ownership



Figure 15 - GPLA website advertising the Vienna Social Housing Field Study as an opportunity to learn "international best practices in mixed-income housing"; GPLA presentation of the Vienna Social Housing Model to housing officials in the Los Angeles, CA region, which included a panel discussion with "Key Takeaways from LA's Delegation to Vienna." Source: Global Policy Leadership Academy

Delegations and Vienna Housing Actors

Frequently, delegations meet individually with representatives from the different social housing sectors and civil society. These presenters include representatives from: The Austrian Federation of Limited-Profit Housing Associations (limited-profit housing sector); *Wiener Wohnen* (municipal housing sector); *Wohnfonds Wien* (municipal land bank); and representatives from the City of Vienna Housing Department to explain various aspects of the subsidies and broader system. After spending significant efforts to translate terms from German to English and simplify the model for international visitors, these presentations by Vienna housing actors tend to become standardized, with some modifications for different audiences (Interviewee 1, Interviewee 2, Interviewee 3).

Delegation organizers described a challenge of sequencing the introduction of an immense amount of information in a short time and the differing informational demands of attendees (Interviewee 3). The composition of delegations also impacts the agenda that the organizers prepare, as well as the subjects presenters emphasize or deemphasize. Interviewees mentioned that housing advocates were more interested in questions of equity, access, and tenant protection issues; developers and philanthropic representatives were more interested in the financing components; and city planners and architects were more interested in design and land use. This balance of time allocation was also a challenge in mixed study delegations.

Consideration of the way Vienna social housing will be perceived by attendees extends to various details. A Vienna housing expert relayed an anecdote about the politics of the site visit selection for one of the delegations:

"I've heard when they tried to organize the site visits, that the organizers explicitly didn't want to visit Karl-Marx-Hof because of the way this might resonate with them, probably the context in the US that it can come across ... as you visited the communist Vienna, then it's more difficult to implement policies. So instead, they visited the George Washington Hof." (Interviewee 2).

5.4.2. Goals and Impact of Vienna Study Delegations

Interviewees who participated in, or organized, these study delegations consistently described a core goal of the trips as inspiring Americans with a vision of what a highly functioning social housing system could look like. Many emphasized the importance of the experiential, in-person aspect of seeing the Vienna housing system in real life and how it had a transformative impact. For participants, being able to see the social housing developments spread throughout the city and speak to both housing officials and tenants went far beyond what could be gathered by reading articles or watching videos.

"I think the purpose of the Vienna trip ... One was just [to] get people to see a very highly functioning social housing model. They should understand the problems with it, they should understand the ways that it needs to be improved, but they should see it for themselves, and they should be inspired by it." (Interviewee 10)

"The in-person [Vienna] delegation absolutely makes a difference. Yes, I read articles and watched videos in advance. Being there and seeing it is different." (Interviewee 4)

"[the lived experience of being in Vienna] it's essential. I think reading about it, this utopia concept, gets triggered in our brains. And we also don't sit with things. We just kind of like, consume it, consume the knowledge. Versus if you're here, you're actually walking the streets and you're seeing the people and you're meeting the speakers. You know, it's different." (Interviewee 3)

Others discussed this travel as critical in getting beyond the parochial, narrow scope and "U.S. supremacy mindset" of American policymaking, society, and academia. These reflections are supportive of the idea of the Vienna Model as a policy imaginary that enables American housing practitioners to envision an alternative housing future and the role of travel in comparative urbanism:

"It's hard, especially for some people on the trip who had never left Chicago. They had to get their passport for the trip. It was a way to get people out of the culture and get out of the U.S. supremacy mindset. Walking down the street, seeing no garbage or experiencing homelessness. These issues might be there in other parts of the city, but just not visible in the center. Profoundly impactful to me. A reminder that we are failing in so many ways in the country. Quality of life seemed so much better." (Interviewee 4)

"You know, you go to these universities [that] are supposed to be the top notch in your fields, and you never get exposed to the top housing model of the world, or what is considered to be it ... I think in California, at least, we're so insulated. It's such a bubble that you don't really seek ... it was just an othering [of things] that happened elsewhere." (Interviewee 3)

A secondhand anecdote from a Vienna Housing expert described an American delegation initially refusing to leave a tour bus to see a social housing development because they thought, "we're gonna get shot here," an extreme assumption which touches on the pre-conceptions some Americans have about social housing (Interviewee 2). For a former delegation attendee from New York City, they also found value from being able to draw connections between the Vienna Model and existing elements of New York's housing system, pointing out that these policy instruments are not so "alien" (Interviewee 10). Rather, the housing system in New York is

of substantially lesser scale and held back because the "government is seeking to do these things but also make it profitable most of the time" (Interviewee 10).

Chicago in Vienna

In April 2024, members of the IL Green New Deal Coalition and City of Chicago officials—the Deputy Mayor of Business, Neighborhood, and Economic Development and the Chair of the City Council Committee on Housing Real Estate—took part in a social housing delegation that included stops in Vienna and Berlin. The delegation was co-organized by IL GND, alongside PowerSwitch Action and Local Progress (coalitions of community leaders and progressive local leaders, respectively). The delegation visited *Karl Marx-Hof*, heard presentations from municipal officials, and participated in many of the other sites typical of Vienna social housing tourism. Importantly, one of the members of the IL GND later became Chief of Policy in the Mayor's Office and was an important force in Chicago social housing policymaking (City of Chicago, Office of the Mayor, 2025b). A City of Chicago official described the trip as a critical source of inspiration and providing a vision for this work inside the city (Interviewee 4).

Seattle in Vienna

Members of the Seattle social housing community have gone to Vienna on separate occasions. The inaugural CEO of the Seattle Social Housing Developer, Roberto Jiménez, attended a GPLA field visit in 2024 (Anu Natarajan, 2024). In May 2024, House our Neighbors (HON) "organized and led a delegation of community and elected leaders to Vienna, Austria, to learn first-hand about how Vienna created a world-class social housing ecosystem" (House our Neighbors, n.d.). The HON website describes the delegation as an "immersive experience of being on the ground," and a Seattle City Councilmember who attended reflected, "After experiencing the impacts of Vienna's intentional and holistic urban planning, I'm inspired to have more conversations about how we build healthy neighborhoods and communities as a part of our conversations about urban planning." (House our Neighbors, n.d.).

A respondent affiliated with the Seattle Social Housing Developer who traveled to Vienna described how, when they first read about the Vienna Model, it seemed utopian at first, and they felt the need to "get under the hood" to better understand it (Interviewee 6). In terms of the impact of the experience, two points were made that remained with them. First, the interviewee recounted speaking to an older woman, a resident of social housing living on a fixed income in Vienna. The woman said she had a "good life," able to wake up and go get a coffee at the cafe and read the newspaper. She said if I lived in your America, I couldn't do this. The only reason this is possible is that I live in social housing. Second, the interviewee compared the lack of income re-certification in the Vienna Model with the American affordable housing model of annual income verification. They reflected on how liberating it would be to not have to do

income certification from an administrative cost savings perspective and how this could also reduce the tension between tenants and building staff.

5.5. Assembling the "Vienna Model" of Social Housing

Vienna housing experts' reflections on abstracting a complex system

Given that some form of policy mobility and policy learning for the United States context is the end goal of Vienna Model popularization, an immense degree of abstraction and simplification work must be undertaken to create portable takeaways from the mammoth Vienna housing system (See Table 4). For example, a limited-profit housing expert mentioned, "You probably have 10 different types of ways of looking [at] calculating the rent within this sector, which you cannot communicate to an international audience over here for one or two hours. It's just impossible ... So you need to simplify" (Interviewee 1). Even comparing rent levels between Vienna and other locales can be challenging, given differences between welfare systems in what one must pay with salary versus what public insurance covers. One delegation organizer noted a dissatisfaction with the rigidity implied by the term "Vienna Model:" "So the biggest problem I see with social housing being translated to the [United] States ... it's seen as just one thing, right? ... Like it's a model. When it's a system. I think model implies a more stagnant structure, right?" (Interviewee 3).

Another area of flattening deals with the Vienna Model eclipsing the national context it operates within. Vienna is unique in Austria for its large municipal housing stock and consistent deployment of housing subsidies to the social housing sector, but other features of the "Vienna Model,"—the limited-profit regulation, rent controls, and strong tenancy laws—are national policies. An official with the Austrian Federation of Limited-Profit Housing Associations (GBV) described how international informational requests to the organization are almost exclusively about the so-called "Vienna Model," and how they "then emphasize there's not just the Vienna model. There's also a national framework" (Interviewee 1).

There can also be incorrect assumptions about who is served by different parts of the Vienna housing system, regarding affordability. Sometimes, there is a misunderstanding that the limited-profit sector, with its cost-rental logic, "can house everyone at [a] level of affordability that ... even the lowest income would pay a rent that is absolutely affordable ... that's a challenge to this type of sector," given "there is a certain financial logic that needs to stack up." (Interviewee 2). Going on to describe the limited-profit housing sector as "a social housing provider, but we're not necessarily doing social policy for low-income households" (Interviewee 2). Vienna housing experts underscore that housing policy alone cannot resolve some of the most pressing social problems and needs to be pursued in parallel with income policy and other welfare systems.

Long-standing commitment to social housing and the Red Vienna legacy	 Housing as shelter, not for speculation Housing is a human right
Universalistic, mixed-income eligibility principles for social housing	 Accessible to low-income residents and the middle class Social housing is not a temporary solution (tenant incomes not re-checked) Spatial distribution of social housing across all districts to avoid social segregation
Social housing as a broader system	 Various tenant social services Multiple housing typologies (municipal housing, limited-profit, co-operatives, etc.)
High-quality architecture and urban design	 "Luxury amenities" (saunas and swimming pools in some developments) Transit-oriented development and walkable neighborhoods Community facilities (kindergartens, community centers) Expert-led developer competitions vet developments on 4 pillars: social sustainability, architecture, ecology, and economy Green building/climate mitigation
Low rents and affordability	 Rent control Large non-market housing stock dampens rents in the private rental sector as well Rents are set on a uniform basis and not linked to income
Tenant protections	 Secure tenancy, unlimited rental contracts in social housing National Tenancy Act Ability to pass on rental contracts to close relatives residing with you (subject to conditions)
Dedicated funding sources	 Stable public funding source ensures consistent housing production (1% payroll tax) Limited-profit financing model and "third sector" of limited profit housing association reinvesting capped profit in more construction
Importance of public land banking and long-range planning	 Vienna controls a large share of land, and provisions land to reduce development costs and control outcomes Active public role in the redevelopment of brownfield sites

Table 4 - The Key Components of the "Vienna Model" in abstracted form

Multiple interpretations and takeaways of the Vienna Model

Respondents reflected on the different ways the "Vienna Model" can be interpreted, with one interviewee explicitly pointing to prior political ideology as a determining factor. The diversity of the Vienna Model allows for these interpretations to sit side by side, but it also allows for contestation over what one should take away from the Vienna case study and how this learning should be applied to the United States. Rather than describe these differing reflections as "misconceptions," a delegation organizer preferred to frame them as multiple "interpretations of what Vienna is" (Interviewee 3). Given the multiplicity of housing typologies and policy logics within Vienna's housing system, the delegation organizer noted, "it's typically seen as this one thing, and it's not. It's multiple things, and that's exactly what makes the housing system successful" (Interviewee 3). One delegation attendee and New York-based housing policy expert reflected explicitly on how pre-existing ideas structured the lessons gathered by visitors:

"I was talking to somebody else about the Vienna Tourism Industrial Complex that people keep sending [over] and about how groups see different things based on their pre-existing ideology. So there was like a California YIMBY [Yes in My Backyard] group that went out there, and they were like, 'See, you just need to build a lot and, you know, the zoning isn't so strict over there.' ... But sure, if that's what you wanna take away from it, you can find it there. Somebody else will show up and be like, 'See, the government housing is what's truly affordable, and the nonprofit is more expensive.' That's true. You know, like, whatever your existing bone to pick was, you can find it." (Interviewee 10)

Diverse interpretations also reflect the 100-year time frame of the Vienna Model, the shifting housing logics in Vienna over this history, and the various focal points of contemporary housing actors. Many American leftists and housing organizers are particularly drawn to the radical Red Vienna period of working-class movements and municipal socialism. Books by critical housing scholars suggest, "for inspiration, we can look to ... Red Vienna," for how to expand, defend, and improve public housing (Madden & Marcuse, 2016, p. 203). Left-wing American magazines notably Jacobin Magazine—have run multiple articles on the legacy of Red Vienna (Jannon Stein, 2014; Tamara Kamatovic, 2020; Veronika Duma & Hanna Lichtenberger, 2017). One 2025 Jacobin article even cited specific policies from the Red Vienna period as lessons for Zohran Mamdani, a leftwing New York City mayoral candidate; "Lesson 1: Linking affordable housing and tax reform — the case of Red Vienna" and pointed to Red Vienna as demonstrating the importance of obtaining a "city's right to set its own tax policies" (Shelton Stromquist, 2025). Other, more practitioner-oriented publications, treat the Red Vienna period primarily as historical background and focus more on the present-day Vienna Model policy instruments of housing subsidy structures, developer competitions, and urban design best practices (U.S. Department of Housing and Urban Development, 2014).

How "Utopian" is the Vienna Model, and is it "translatable"?

There is a strong utopian streak that runs through the Vienna Model discourse in the United States, presenting Vienna as a city that has "solved" its housing crisis (See Figure 15) and a "renter's utopia" (Mari, 2023). Social housing is cited by many journalistic observers as one of the "secrets" that makes Vienna one of the best places to live in the world (Lang, 2024). While acknowledging the real accomplishments the city has achieved and maintained comparatively well, Viennese housing experts also mentioned how Viennese politicians make use of these superlatives to build legitimacy for the city's policies and actively brand "Vienna ... [as] being the capital of social housing." (Interviewee 2). Beyond self-promotion, Vienna housing actors also noted how international recognition can be useful domestically, because it "helps you to make certain arguments at the national level" during housing policy deliberations (Interviewee 2). Ultimately, Vienna study delegation organizers are seeking to promote the Vienna Model to an American policymaking audience, and while efforts are made to portray the real challenges to the city's model, the critical aspects are, unsurprisingly, a minority of the content.

Vienna housing experts and educators described a potential "danger" with this utopian marketing of the city's housing system. Cautioning that, first, this utopianism ignores the real challenges and stresses the Vienna housing system is facing (obscuring the significant amount of work required to maintain the system), and second, it can make the city's policies appear to be unattainable and hyper-specific to its 100-year history. Arguing that, "often when you sell something, this is so brilliant, and this is a long history, then other countries or cities might say ... We don't have time for that. ... I think there's also a bit of a danger of that." (Interviewee 2). To navigate this tension with communicating the Vienna Model, experts described intentionally working to "break it down to something specific," outlining discrete policy instruments to make the policies appear more actionable (Interviewee 2 and Interviewee 3) or presenting a broad housing philosophy that can be adapted to specific circumstances (Interviewee 1).

Critical U.S. reactions to the Vienna Model

The increasing number of references to the Vienna Model by left-wing housing advocates and prominent media reports in the U.S. has already begun to generate a counter-reaction from centrists and conservatives (Britschgi, 2023; "Vienna's Social Housing, Lauded by Progressives, Pushes out the Poor," 2024; Yglesias, 2023). These critiques tend to be launched from two directions. First, U.S. critics contest the central idea that Vienna is a "renter's utopia" as described in glowing journalistic accounts. Second, in addition to challenging the success of the model, critics also emphasize the exceptional and non-replicable nature of Vienna's housing system. A report and opinion piece written by a housing policy expert affiliated with the American Enterprise Institute, a conservative U.S. think tank, are representative of these perspectives. Peter (2023) asserts that "more critical newspaper reports and academic studies

from neighboring Germany or Switzerland have been ignored entirely in US-based discussions of Vienna's social housing" (p. 1). Instead, Peter's analysis draws primarily on a single, negative evaluation of the Vienna social housing model undertaken by German academics (Simons & Tielkes, 2020).³⁸ On this basis, Peter (2025) concludes, "Vienna's social housing is expensive, unfair, and increasingly unsustainable. It is a cautionary tale, not a model to emulate."

Major critiques include hidden tenant costs (utilities, maintenance repairs, and large tenant downpayments to access limited-profit housing), the long-term resident vs. newcomer inequalities with accessing cheaper housing in the private rental sector, and growing trends of social segregation. With a skeptical reference to the robust Vienna Model informational infrastructure, Peter remarks, "Vienna's greatest accomplishment may be its ability to sell its social-housing model as a global success story, thanks in no small part to an international marketing department dedicated to promoting the policy" (Tobias Peter, 2025). Regarding the exceptional nature of Vienna, critics like Peter emphasize how the housing system "emerged from unique post-World War I circumstances, when hyperinflation, political chaos, and a collapsing empire allowed the city to amass cheap land and build housing at scale;" the substantial population decline in Vienna during much of the twentieth century, which reduced housing demand; and the municipality's control over a large fraction of buildable land, allowing it to "extract sweeping concessions" (Tobias Peter, 2025). Rather than follow the policies of Vienna, these market-oriented critics argue that U.S. policymakers should "unleash housing supply by reforming restrictive zoning and reducing regulatory barriers" (Tobias Peter, 2025).³⁹

Lastly, the trend of U.S. study delegations to Vienna has, in some cases, generated negative scrutiny. A mirror image to the approving New York Times Magazine reporting on the 2023 New York delegation, the rightwing New York Post published an article that framed the trip as "a group of Democratic Socialists and other far-left pols have spent much of the past week on an expenses-paid trip to Vienna as progressives push so-called 'social housing' statewide" (Rich Calder, 2022). The article also cited negative reactions from social media users who "questioned [attendees'] motives — and financing," such as, "Who is paying for this junket? Hope it isn't my fellow New York taxpayers! And if not who is paying for this glorification of Communism ... Karl Marx" (Rich Calder, 2022).40

³⁸The main research paper Peter cites was commissioned on behalf of a German real estate industry group (Bundesarbeitsgemeinschaft Immobilienwirtschaft Deutschland). While some of the criticisms levied are found in other research studies as well, in personal communication, a Viennese housing expert noted that the authors systematically focused on the negative features of the Vienna housing system and downplayed Vienna's successes. ³⁹ The negative perception of U.S. public housing is also marshalled to caution against publicly provisioned housing,

and Vienna's low homeownership rate—connected to its social housing legacy—is cited a "very severe trade-off for the homeownership-focused US" (Peter, 2023, p. 10).

⁴⁰ The New York delegation was privately funded, but public funds have been used to pay for elected officials' travel in other Vienna study delegations.

6. Mobilizing "Social Housing" in the United States

While debates over the housing question in the United States are longstanding, the 21stcentury discussion of "social housing" in the United States is a more recent phenomenon. Multiple interviewees pointed to the publication of the 2017 report by the People's Policy Project, a small progressive think tank, Social Housing in the United States, as an important milestone in setting the terms of this contemporary debate (Interviewee 10, Interviewee 12). The report framed large-scale municipal housing, built and owned by the public sector, as the best solution to a shortage of affordable housing and growing rent burden in the United States. Social Housing in the United States was followed by a proliferation of reports over the next several years, many of which were produced by advocates in the tenants' rights movement, progressive policy and advocacy organizations, and academic research centers with a critical lens. However, antecedents can be found in the circulation of the 2013 Vienna Model exhibition within the U.S., as previously discussed in Section 5.3. In response the question of why social housing is getting increased attention in the U.S., an interviewee mentioned grassroots organizations were "tired of putting out fires," and sought a "bigger vision for a model or structure that will help stand up to any type of rollercoaster," whether economic crisis, pandemic, or climate disaster (Interviewee 11).

Despite the increasing prominence of "social housing" within the U.S. housing policy discourse, the usage of the term is bound up in confusion and contestation over what exactly it entails. Questions include: problem definition, that is, what are the problems in the U.S. housing system social housing is seeking to solve; the financing model, income-mix, and governance of social housing; whether or not new institutions are required; how different social housing is from existing models in the U.S.; and concerns about whether the term is already being co-opted. There are also debates over whether international or domestic policy models are better to learn from and make reference to.

6.1. What Are the Problems "Social Housing" Seeks to Solve in the U.S.?

When seeking to define and advocate for social housing in the U.S. context, an important element is framing and problem definition. The crucial role of problem definition in shaping the policy agenda and the resulting policymaking process has been the subject of substantial research literature (Gurran & Phibbs, 2015; Rochefort & Cobb, 1994; Weiss, 1989). Problem definition refers to both how the description of a given social problem affects the prominence it holds on a governmental or advocacy policy agenda and how problem definitions are connected to the solutions that policy actors devise. In other words, beliefs about the root causes of housing unaffordability in the U.S. directly influence the potential solutions one proposes.

Following a document review of social housing reports and journalistic accounts, the following themes of problem definition emerge (See Table 5).

	U.S. Social Housing Problem Definitions		
1	Affordability, rising rents, and high housing cost burden		
2	(Affordable) Housing shortage or lack of housing supply		
	Inability of private market or market-driven solutions to provide sufficient		
3	affordable housing		
	The status quo U.S. affordable housing policy instruments are insufficient or		
4	fundamentally flawed		
5	Housing is seen as a speculative asset, but it should be a universal public good		

Table 5 - Problem definitions of social housing advocates

1. Affordability, rising rents, and high housing cost burden

Tenant housing cost-burden and housing affordability pervade the discussion of social housing. Social housing advocates frequently note the worsening trends of housing affordability and the growing share of the U.S. rental population that is cost-burdened (when a household spends more than 30% of its gross income on housing costs). A commonly reproduced statistic is the finding that 50% of renter households in the country are cost-burdened and more than a quarter are severely cost-burdened (Joint Center for Housing Studies of Harvard University, 2025). 41 Though affordability challenges for the lowest-income and most vulnerable renters are front and center, some researchers and activists have also contextualized the need for social housing by referencing the growing share of the population with housing burdens. Housing research publications observe that, "renter cost burdens are rising fastest among middleincome households" and grassroots organizers in the State of Rhode Island point to how "a long-term housing crisis facing the lowest income tenants has expanded to affect many middleclass renters" (Joint Center for Housing Studies of Harvard University, 2025, pp. 31–32; Stein & Mironova, 2024, p. 58). Additionally, data showing rents have inflated faster than income is regularly referenced (Council of Economic Advisers, 2024, p. 145). Lastly, the challenges of high housing cost-burden are linked to increased homelessness (Amee Chew, 2022, p. 1).

2. (Affordable) Housing shortage and lack of housing supply

Another commonly used problem definition concerns the existence of a housing shortage (or affordable housing shortage) across the United States, especially in high-cost cities. In recent years, a general "housing crisis" has been reframed more specifically as a "housing shortage" or

⁴¹ In the United States, "affordable housing" is commonly defined as housing for which a household spends no more than 30% of its gross income to secure, including utility costs. A household that spends more than 30% of its income on housing costs is considered cost-burdened, and those for which housing costs make up more than 50% of income are "severely cost-burdened."

"lack of housing supply" in the United States. Headlines regularly declare the U.S. faces a massive housing shortage, with estimates ranging from 1.5 to 5.5 million additional units needed (Elena Patel et al., 2024). Some researchers have estimated a housing shortage as large as 20.1 million homes, a stunning 14 percent of the national housing stock in 2021 (Corinth & Dante, 2022). An any of the most prominent estimates primarily (or implicitly) frame this as an undersupply of market-rate units, with some exceptions like the National Low-income Housing Council, which frames the housing shortage as a shortage of more than 7 million affordable homes for our nation's 10.8 million plus extremely low-income families (National Low Income Housing Coalition, 2025). This housing shortage problem definition has been promoted by a variety of actors—academics, industry groups, and think tank housing experts—in numerous news articles and policy reports and is influencing government housing policy frameworks at all levels (Dougherty & Watts, 2024; Elena Patel et al., 2024; Zillow, 2024).

The housing shortage/housing supply frame can be taken in multiple directions. The more market-oriented social housing proponents (sometimes called "Left YIMBYs" or supporters of "public development") focus on a lack of both market-rate and non-market housing. Discursively, these actors more commonly use the term "housing supply" and increasing "housing production." Historically, YIMBYs have been perceived by critics as orthodox free-market and zoning fundamentalists (Michael Friedrich, 2024; Seth Ackerman, 2023), though recent articles, such as "What far-left cranks get right about the housing crisis" (Eric Levitz, 2025), point to some nuance in this analysis (Darrell Owens & Galen Herz, 2022). While many Left YIMBYs still embrace and prioritize upzoning, some also acknowledge, "the [broader YIMBY] movement should not (and does not) advocate exclusively for [zoning] regulatory change" and that supporting cash transfers, rental subsidies, and social housing is important given that "increasing housing production cannot ensure universal affordability … [as] it will never be profitable to sell shelter to the indigent" (Eric Levitz, 2025).

The Left YIMBYs interested in social housing are more likely to reference technical financing challenges to growing affordable housing supply (high interest rates, rising property insurance costs, and jumps in building materials costs) when making the case for public development (Sheree Bouchee & Ashwin Warrior, 2025). Though tenant-based social housing advocates differ on the zoning question, they also voice support for expanded housing production. The key difference is that tenant-based social housing advocates focus on an *affordable* housing shortage and make explicitly left-wing political attacks on real estate speculation and a surplus

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⁴² These estimates often become reified and taken for granted in housing policy debates. The large variance in between these housing shortage estimates is not frequently dwelled upon in this discourse, variations driven by chosen methodological approaches and assumptions of what a "balanced" housing market would entail. Differences in how one considers the question of "pent up demand" for household formation and what constitutes the "normal" housing vacancy or production rate strongly influence these estimates.

of market-rate, "luxury" housing (Amee Chew, 2022, pp. 38–39). The housing supply these tenant-based activists want to increase is specific: "social housing ... permanently affordable to all, even the lowest income residents, including residents with no incomes" (Alliance for Housing Justice, n.d., p. 2).

3. Inability of private market or market-driven solutions to provide sufficient affordable housing

A closely related problem definition points to the inability of the private market or market-driven approaches to provide sufficient decent and affordable housing. This problem definition can go down two paths. First, the social housing policy reports (disproportionately written by tenant advocates) tend to argue much more strongly that the private sector is incapable of being mobilized to resolve the housing crisis. These tenant-driven reports critique mainstream zoning-centric efforts to improve housing affordability—that is, critiquing the YIMBY (Yes in My Backyard) movement and the market-oriented housing supply shortage problem definition favored by economists (Tapp, 2021). For example, social housing organizers from California wrote, "We also diverge from the YIMBY analysis that supply and demand are at the root of the affordable housing and homelessness crises, instead believing it is rooted in financialization and speculation" (Stein & Mironova, 2024).⁴³

It is hard to portray just how hegemonic the YIMBY vs. NIMBY binary (with all its flattening) has become in the U.S. urban housing discourse—rooted in the housing policy debates of California, the birthplace of YIMBYism (Cannedy, 2024).⁴⁴ In 2018, leftwing tenant activists associated with

In this zoning debate, rarely does anyone self-identify as a NIMBY, given that it is considered a negative term for unprincipled obstruction. For example, leftwing tenant advocates are sometimes called "Left NIMBYs" by their YIMBY opponents, a term they reject. YIMBYs are often called "developer shills" and tools of the capitalist class. Furthermore, there still are many powerful, straightforward "NIMBYs," typically portrayed as advantaged homeowners in the original sense of the term, who continue to use their political resources to block affordable housing or apartments they presume will house "transient renters" from their wealthier single-family neighborhoods. These homeowners also reject the term NIMBY, and instead cast their role as "defending" their neighborhoods or preserving neighborhood character (Einstein et al., 2020).

⁴³ To understand the United States' social housing discourse, it is also necessary to understand that it is preceded by an acrimonious, years-long debate over land use zoning. Disagreements between a centrist-to-center-left YIMBY camp and more left-wing tenant activists over the utility of upzoning and the role of new market-rate development in high-cost cities (Anzilotti, 2019; Barkan, 2022; Current Affairs, 2022; Seth Ackerman, 2023). Specifically, debates over the relative merits and demerits of allowing denser, new construction in the private rental sector as a way to reduce (or moderate increases in) rents versus whether new "luxury" market-rate construction instead increases rents for existing residents and furthers the gentrification/displacement of marginalized populations. For more detail, see (Brouwer & Trounstine, 2024; McElroy & Szeto, 2018; Tapp, 2021). This debate has also resurfaced in arguments over the 2025 book *Abundance*, given the authors strongly promotes YIMBYism as an element of an "abundance agenda" liberals should adopt (Resnikoff, 2025).

⁴⁴ One interviewee described California housing politics as "toxic."

the Democratic Socialists of America (DSA) looked for new terms to explain their position, tired of being labeled NIMBYs. As leftists, they were quick to attack wealthy homeowners "co-opt[ing] the language of gentrification in order to maintain their segregated, wealthy communities" and also acknowledged problematic land use rules like "onerous parking requirements" (Administrative Committee, 2018). At the same time, these activists disagreed with YIMBY upzoning proposals. Public Housing in My Backyard (PHIMBY) was coined (somewhat ironically) to describe the principles of their opposition to state-level legislation that would have upzoned land parcels near transit stops to expand housing supply, stating:

"Ultimately, any actual solution to our crisis requires a radical redistribution of land and resources, facilitating the construction of decommodified housing on a massive scale. Let's move beyond the trickle-down approach of 'Yes In My Backyard' (YIMBY) to policies that truly guarantee housing as a human right, demanding 'Public Housing In My Backyard'" (Administrative Committee, 2018).

The alternative framing of PHIMBY was thus an attempt to avoid this narrow conceptual binary, and it can be interpreted as a predecessor to the more recent use of "social housing." Especially since some of the same actors were involved in both discourses. Furthermore, a tenant's rights organizer affiliated with the DSA, who later was heavily involved in social housing activism, presented "Vienna ... as a paragon of PHIMBYism" in the early journalistic reporting that explained the term (Placzek, 2019).

On the other hand, Left YIMBYs are less market antagonistic, and many have adopted an analysis of the housing shortage/crisis that embraces a large role for market actors. That said, many also agree that the market alone cannot solve the housing shortage. This position is tied to Left YIMBY's deeper engagement with institutional government policymaking and a mindset focused on navigating the existing highly market-oriented U.S. housing political-economic system. In particular, Left YIMBYs cite the high returns that private equity investors demand to finance market-rate housing (~15-20%) as a problem, leading to new housing construction freezing up because developers can no longer assemble the needed financing (Center for Public Enterprise, 2024; "Public Developer Models in the U.S. and Beyond," n.d.). This has led some Left YIMBYs to call for the government to engage in "public development," a vision whereby an entrepreneurial government intervenes in the housing sector by providing low-interest loans to

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⁴⁵ The embrace of public-private-partnerships to increase housing supply is seen as the only realistic, near-term way for local governments to fund additional housing construction in an environment of increasing affordable housing needs, climbing construction & operational costs, and a lack of political support to radically increase housing budget allocations at all levels of government. These Left YIMBY housing practitioners and advocates regularly argue "the federal government is not coming to save us," and that the sector needs to tap new funding sources (private capital and inclusion of market-rentals) to deal with significant maintenance backlogs and achieve new construction or acquisition goals.

co-finance private-led developments, and in return, takes a majority ownership stake in the building and secures a portion of units as affordable (Dougherty, 2023).

4. Status quo U.S. affordable housing programs are insufficient or fundamentally flawed

For social housing advocates, the demand-side, market-oriented housing vouchers are critiqued on several fronts. Criticized for inadequate funding that only reaches roughly 1 in 5 eligible low-income households; intensive means-testing; and the struggles participants face with utilizing vouchers within program deadlines and in the face of landlord discrimination, resulting in forfeited vouchers and/or spatial segregation. Furthermore, housing vouchers are criticized as an "open-ended subsidy to private providers … [that] can stoke the rental market further, raising prices overall and exacerbating the affordability crisis" (Gowan & Cooper, 2018).

Regarding supply-side programs, the social housing reports primarily focus on the limits of the Low-income Housing Tax Credit (LIHTC), which is the largest public subsidy for new affordable housing construction in the United States. The main critiques of LIHTC are that it is inadequate in scale and scarce; involves an inefficient and costly subsidy to corporations and the wealthy; results in the buildings that are disproportionately sited in poor neighborhoods to avoid political resistance; and has the built-in expiration of affordability requirements (Martin et al., 2025; Rosales et al., 2025). A specific structural critique of the LIHTC program focuses on how LIHTC's so-called "affordable" rents are too high for the lowest-income households most in need, with some spending more than half of their income on rent (Amee Chew, 2022, p. 20, 2024; Corianne Payton Scally et al., 2018, pp. 9–10).

The intensity of the critique of LIHTC by many tenant-based social housing advocates is out of step with the mainstream affordable housing sector, which tends to laud LIHTC as a "successful" program that just needs more funding. This heterodox analysis was particularly contentious in Seattle, where LIHTC and status quo affordable housing strategies were campaigned against initially, though this later moderated (Interviewee 7). In contrast, most of the "public development" wing of social housing is message-disciplined in presenting the new mixed-income public development models as "a complement, not a competitor", to existing LIHTC projects and funding streams (Center for Public Enterprise, 2024). Nonetheless, in interviews, many public development advocates were also critical of the LIHTC program and its inefficiencies, yet were resigned to its continued dominance, for the time being, until an alternative housing finance source can supplant it (Interviewee 12).

Lastly, public housing is a program that looms large over the social housing advocacy space. As the most well-known (and highly stigmatized) affordable housing program in the country, there is a complicated, varied stance that social housing reports take. With advocates critiquing the disinvestment and intentional sabotage that they describe as leading to the poor housing

outcomes for public housing tenants, while still holding up the program as important for the more than 1.5 million people who still call it home (Alliance for Housing Justice, n.d.). The current size of the program is described as much too small. Proponents of mixed-income developments critique the intense means-testing of public housing, with some reports arguing "poor-only public housing concentrates poverty in particular locations—directly creating one of the worst social ills in American cities" (Gowan & Cooper, 2018, p. 12). Furthermore, they point out how the low rental collections leads the program to rely heavily on governmental appropriations, making it more vulnerable to budgetary cuts.

5. Housing is seen as a speculative asset, but it should be a universal public good

A consistent critique amongst the more grassroots, tenant-based social housing advocates is that the U.S. desperately needs to reject the assumption that housing is a speculative good and a source of profit (Alliance for Housing Justice, n.d.; Stein & Mironova, 2024). References are made to planned vacancy by wealthy investors using housing as a tax shelter and a broader conclusion that "speculative investment destroys affordable housing and also channels vast capital away from producing it" (Amee Chew, 2022, p. 6). Particularly, many activists target the role of corporate and private equity investment in the housing system. Instead of thinking of housing as a real estate commodity, the most (explicitly) ideological social housing advocates position "housing as a human right" or a "public good" (Amee Chew, 2022, pp. 5–8; Rosales et al., 2025, p. 11).

Relatedly, many social housing advocates are united in a vision for a universalist orientation to non-market housing, because "integration across income levels undermines the social stigma that often becomes associated with public housing, as it has in the United States, and creates a broader, popular constituency for the maintenance of the system" (Kevin DeGood et al., 2024). The expansive access to non-market housing in Vienna and the long-term political durability of the housing program make Vienna a useful "real world" case study for advocates using the universal public good problem definition. Arguably, this is the problem definition that most goes against the dominant housing ideology in the United States. Cutting against the long dominant policy consensus of expanded private homeownership as a source of housing stability and wealth creation.

6.2. Back to the Future: Social Housing Policy Mobility Part 2?

Reading the New Deal era emergence of U.S. public housing as historical policy mobility

Looking historically, one would be justified in describing America's extant public housing system as the partial result of social housing policy mobility, given the influence European models of social housing and apartment living had on American proposals in the 1920s and 1930s. Yet the intense degree of mean-testing that became the hallmark of U.S. public housing was not the original vision of these so-called "public housers." As Radford (1997) describes, intellectuals, progressive architects, and advocates put forward a vision of non-commercial housing (provisioned by both government authorities and local, non-profit cooperatives) that would serve a wide spectrum of the population—including both middle-class and low-income households—in well-planned and designed housing developments that offered community facilities and green space. However, powerful mainstream liberal segments of the public housing coalition disagreed with this vision and instead called for a focus on slum clearance and rehousing the poor. Real estate interests and conservative politicians also viciously attacked and lobbied against the public housing program, but to the extent there would be one, they strongly preferred a version limited to the poor and leaving housing for the middle classes to the private market. As von Hoffman (2012) writes: "In the end, the least common political denominators became slum clearance, not the sweeping mass-housing visions of the public housers." (von Hoffman, 2012, p. 328).

This set in motion a two-tier policy framework that defined U.S. housing policy in subsequent decades: an upper policy tier of subsidized financial products to expand middle-class home ownership, and a means-tested, lower-tier of direct housing assistance for the poor (Radford, 1997, pp. 197–198). This policy outcome is in keeping with the policy mobility literature, which underlines how policy movement is highly mediated by existing power structures, leading to substantial policy mutation and failure to disrupt existing power structures. As Neufville and Barton (1987) argue, "although these creative and influential individuals [public housers] did succeed in getting some of their specific innovations adopted ... these took on different meanings than their creators intended ... public housing, became, not a model for other kinds of housing, but an inferior way to live for those who were not part of the American mainstream" (Neufville & Barton, 1987, p. 190).

The rhyming of history between the 1930s American public housing movement and the emerging 2020s American social housing movement has not gone unnoticed in the advocacy space. Much of the present-day historical reflection has centered on the life and work of the housing reformer Catherine Bauer and the Labor Housing Conference, a coalition of left-wing unions that supported mass housing. News articles, opinion pieces, policy reports, and podcasts on the topic of social housing all spend time delving into the "forgotten history" of early New

Deal era reformers and the leftists that sought to bring European models of non-commercial housing to the United States (Daniel Denvir, 2023; Katelin Penner, 2024; Mari, 2023; Places Editors, 2020; Schindler, 2025). ⁴⁶ Moreover, this historical reflection is often couched in terms of what lessons a historical analysis of the failures and successes of this earlier phase of public housing mobilization has for contemporary housing activism. For example, some advocate for reformulating an alliance between housing justice activists and labor unions to create a more "coherent and well-organized political constituency" for working-class housing (Dreier, 2023).

6.3. Reassembling Social Housing in America: Does it Pencil? For Whom?

Debates over whether a certain model should "count" as social housing points to the contested nature of the overall project. On the policy front, two significant and deeply interrelated questions emerge: "For whom is social housing for?" and "Does it pencil?" I argue that tenant-based housing actors center the question of "For whom?" and focus on defining a vision and set of outcomes they want social housing to achieve. In contrast, the practice-oriented public developers/Left YIMBYs are deeply concerned with how social housing will be financed, or "Does it pencil?" Public developers also envision the government taking a much more entrepreneurial role in a housing market and engaging in productive partnerships with private developers. Tenant-based advocates are much less open to the involvement of market actors.

Interviewee 11—who had a mix of housing organizing and housing finance experience—discussed how the social housing movement is "led by grassroots groups" and that housing finance experts are often "left out of these conversations." Commenting that not all policy experts and organizers are trained in development finance, but that development finance is "so key to turning [social housing] from a plan to an actual development." Interviewee 11 suggested some advocates have become "fearful and distrusting of finance," given how the current financial system has mistreated housing and people. For example, when Interviewee 11 described how their vision of social housing includes "operating subsidies to not defer maintenance and capital improvements in the way public housing agencies have had to," they reflected, "I think that's not really talked about enough. Again, it's [that] people don't want to talk about penciling out. That sounds like a bad developer term." Honing in on how the discomfort among values-driven advocates in discussing financial terms has led to "a gap in the field," Interviewee 11 emphasized the importance of strong principles but went on to conclude,

⁴⁶ While there is a variety of scholarship on the history of U.S. public housing, Gail Radford's *Modern Housing for America: Policy Struggle in the New Deal Era*, with its focus on the housing reformer Catherine Bauer, has become the definitive text.

⁴⁷ The question "Does it pencil?" is a real estate term developers use to assess if a project makes "financial sense" and is sufficiently profitable (Dougherty, 2024).

"please let us talk about money and how we can actually use it to build [social housing] out ... in the most principled way ... but we can't talk about principles constantly."

6.3.1. Debates over Definitions

One of the most readily apparent hurdles social housing advocates face is the "foreignness" of the term "social housing." In the United States, the term is not common. ⁴⁸ As a result, significant energy has been expended by proponents (especially among tenant activists) to define and educate various audiences about their particular vision for social housing and the principles any program should abide by. Part of this desire among advocates to get the social housing policy framework right in the first instance, based on the concern that "once local government or state government decides it wants to do something, it's so difficult to change" (Interviewee 11).

As discussed in Section 2.1, there is neither a singular international definition of "social housing," nor do social housing systems take a uniform approach across countries. Nevertheless, definitions are important in framing the policy debate. Some interviewees mentioned frustration with the terminology of "social housing," with Interviewee 12 (more associated with public development) stating, "My big picture thought on … the social housing terminology question is I think there's some terminology confusion that undergirds the whole thing." Going on to mention how the U.S. national government reports its existing subsidized housing stock in counts of "social housing" for international organizations like the OECD, yet these existing units do not count in some advocates' narrower definitions.

A Chicago-based housing expert described two ways that social housing is being understood in the American context. First, "social housing has come to be known in, progressive housing circles, as essentially public housing that is not Section 9 public housing. Some form of publicly controlled or sometimes community-controlled [model]" (Interviewee 5). Second, some present social housing as an umbrella term to refer to a broader non-market housing sector, including traditional public housing, LIHTC, and other programs. The respondent also mentioned high levels of skepticism and "a lot of eyerolling" to the social housing push among some housing officials in other cities, who questioned why a new apparatus is needed when LIHTC or public housing could be already be deployed to achieve the core principles of social housing, namely tenant governance, high environmental standards, mixed-income, and public ownership. Agreeing in part with these critiques, the respondent still felt the financial production mechanism of public development was unique and worth pursuing. Later in written correspondence, when discussing the definitional debates about what should count as "social

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⁴⁸ Americans often use phrases like "affordable housing" or "public housing" interchangeably, though policymakers use those terms to communicate specific things. Sometimes, programs are referred to by a shorthand or the local government agencies associated with them implementing them, using Section 8 to refer to the Housing Choicer vouchers or NYCHA (New York City Housing Authority) to refer to public housing (Interviewee 10).

housing," this interviewee observed, "I don't like 'Social housing is affordable housing that checks my pet issue boxes.'" Preferring to see "social housing" as either a broader umbrella term for all non-market housing or more specifically refer to public development models like the Montgomery County Model (Interviewee 5).

An interviewee at a national progressive nonprofit, more aligned with tenant-based social housing advocates, nevertheless admitted:

"Honestly, I kind of hate the term 'social housing.' In some ways, it's one of those things that is just not intuitive and it's so widely open to interpretation, which makes it easy to co-opt from a movement standpoint. So a lot of times, depending on which group I'm in, I'll say 'permanently affordable, decent housing or housing that's removed from the speculative market' and people just get that" (Interviewee 11).

Interviewee 11 went on to say they "personally like to see [social housing] as a spectrum." Cautioning against insisting social housing has to be "eight things perfectly in order" before it counts, as this can discourage the exploration of new ideas in jurisdictions where innovation is politically challenging. Reflecting on the importance of principles as a long-term "North star," while also acknowledging that political and economic conditions likely mean these principles will not all be met in the short-term.

The following is a sampling of the social housing definitions that have been proposed and the related background.

People's Policy Project

Preceding the later social housing policy reports by a few years, the focus of the 2018 *Social Housing in America* report was not to define "social housing", but first, to overview successful social housing models (in Vienna, Finland, and Sweden) where "municipal housing policies have been designed to cater to people of various income levels, rather than just serving the 'deserving poor,'" and second, propose a policy plan for the United States. An outlier compared the later social housing reports, it proposed a "self-financing," cost-based model, with the federal government providing low-cost loans and capital grants to fund construction. Tenants from a mix of incomes would pay a rent that covers operating costs, maintenance costs, and capital costs, after subsidies. When it cannot be avoided, cross-subsidized mixed-income developments that are primarily market-rate are deemed acceptable, but "inter-development subsidization should be strictly limited in its scope" (Gowan & Cooper, 2018, pp. 31–32). While conceptual and visionary, this report had a greater focus on sketching out a high-level policy program and engaging with the question of "Will it pencil?" and not solely on "For whom?"

Alliance for Housing Justice

Tenant-based social housing advocates have increasingly proposed using a principles-driven framework to outline the goals and outcomes social housing would achieve. For example, the Alliance for Housing Justice, a coalition of various grassroots housing and policy non-profits, developed the following 8 principles:

Socially owned	Anti-racist and equitable
Permanently decommodified	Sustainable
Permanently affordable	High quality and accessible
Under community control	With tenant security

Table 6 - Alliance for Housing Justice social housing principles. Source: Alliance for Housing Justice

Social housing is understood as an umbrella category of housing models following these principles, whether it be public housing, community land trusts, limited equity co-ops, tenantowned cooperatives, or mission-driven non-profits. Within these broader principles, there are also other, more specific policy choices. Some include: No tenant in social housing should pay more than 30% of their income inclusive of all housing costs; strong tenant protections (e.g. just cause eviction protections, rent control); green building standards; labor standards; focusing investments in predominantly "Black, Latinx, and Indigenous" communities; meaningful resident and community control; and entirely publicly financing with no private sector involvement (Alliance for Housing Justice, n.d.). This tenant-based report was substantially focused on the "For whom?" question

The IL Green New Deal Coalition (Chicago)

The IL Green New Deal Coalition (IL GND) in Chicago heavily used the contrasting approach to existing housing programs in defining social housing, with the campaign's website answering questions like: "How does social housing differ from public housing?", "Aren't co-ops the same thing as social housing?", "What is the difference between affordable housing and social housing?", and "What will be the role of the Chicago Housing Authority (CHA) in social housing?"

The IL GND answers the question, stating: "social housing is a form of public housing FOR ALL but the difference is that it isn't restricted to very low-income residents" (IL Green New Deal, n.d.-b). The coalition also proposed a 30% income cap on rents, like the other grassroots tenant-based organizations. One notable difference, tied to the Chicago context, is the strong

opposition to the Chicago Housing Authority (which manages the city's public housing program) having a role in social housing.⁴⁹

"CHA has never operated under the principle of people first and has a long and harmful history when it comes to housing ... When we look at models for Social Housing that are working, we see where models, for example, Vienna, work and where our current model, CHA, is not. The root of the issue is accountability. The Vienna model is rooted in public accountability whereas the CHA model is rooted in private accountability." (IL Green New Deal, n.d.-b)

The IL GND definition of social housing also reflects a tension some interviewees mentioned regarding the role of existing public housing in the conception of social housing. Interviewee 11 described the "big challenge" of bridging a divide between housing organizers focused on public housing that are seeking to preserve the deeply underinvested program and those operating in the private market, more inclined to focus on building something new. Describing how "there's a lot of work to be done in bringing [the movements] together," with one strategy being to underscore that "the restoration and repair of public housing is a critical piece of social housing" (Interviewee 11). IL GND had a large emphasis on "For whom?"

House Our Neighbors (Seattle)

House Our Neighbors, the Seattle-based housing activists who campaigned for the Seattle Social Housing Developer, used the definition "social housing is removed from the speculative market, available to all incomes, permanently affordable and held as a public good in perpetuity," and including four pillars—publicly owned in perpetuity, permanently affordable, free from market speculation, and cross-class communities (House Our Neighbors, n.d.). Similarly, these organizers also centered "For whom?"

6.4. Usage of International vs. Domestic Policy Models

As predicted by the policy mobility literature, the new, mutated housing models that have been reassembled in the U.S. differ substantially from the Vienna Model, given the different histories and housing ideologies; institutional and governance arrangements; and political, economic, and social contexts. Some of the specific policy choices that depart from the Vienna Model are explicitly acknowledged but sometimes they were left unacknowledged. For example, some interviewees suggested that the high degree of tenant control over buildings that some tenant-based advocates put forward as core to social housing is not common in

⁴⁹ Chicago has a long, contentious history with public housing, including racial segregation, poor maintenance, and mass demolition of high-rise buildings in the 1990s and 2000s, with only partial mixed-income replacement (Hunt, 2001; Joseph, 2010).

Vienna's municipal or limited-profit sectors, where housing is governed by large-scale public bureaucracies or non-profit associations (Interviewee 5). Another agreed that "I think people might have some illusions about that [the high degree of tenant control in European models] (Interviewee 10).

While the Vienna Model is one of the most prominent international social housing models referenced by advocates, there have been a growing number of other international approaches to housing being discussed in the U.S. housing policy discourse. Some examples can be seen from recent articles and policy briefs, including: "What Can We Learn from the Dutch Social Housing System?" (Hanneke van Deursen, 2023), "Opening the Door to Social Housing in the US: Learning from the Italian Model" (Ben Metcalf, 2024), "Singapore Housing Lessons for the Biden Administration" (Robert Fischer, 2021), and "Teachings from Tokyo" (Joe McReynolds, 2025). In addition to print and online publications, the circulation of these disparate policy models has been fueled by podcasts, YouTube videos, and social media posts highlighted novel locales as a source of inspiration for U.S. urbanists. While a disproportionate number of these international examples tend to come from the Global North, particularly wealthy European countries, some U.S. social housing advocates intentionally include Global South examples, such as cooperatives in Uruguay, and caution against Eurocentrism (Interviewee 10).50

Furthermore, the source of new policy model inspiration is not just a question of "international imports." The influence of new "domestic" housing policy models, most notably the Montgomery County Model, further complicates the analysis of how the Vienna Model has landing in different urban terrains, given both models are being referenced simultaneously in housing debates. While there is an ideological divide regarding who champions which policy model—leftwing, tenant-based actors tend to refer to Vienna and other international examples, while more practitioner, institutional actors focus on domestic models—there is also a striking degree of mixing and matching of reference points. Some tenant-based U.S. social housing advocates simultaneously reference both Vienna and Montgomery County as proven best practices.

6.4.1. The "Montgomery County Model": Domestic or International?

In March 2021, Montgomery County, Maryland, a largely suburban community in the Washington D.C. metro area, approved allocating \$50 million to fund the creation of a Housing Production Fund (HPF) with little national fanfare. The public hearing agenda described the HPF

⁵⁰ This interviewee also discussed how there can be racist assumptions embedded in an exclusive focus on European social housing, namely the assertion by skeptics that social housing is only possible in Europe because Europe is "socially homogenous," and by that skeptics mean white. Going on to harshly critique the idea that a diverse society cannot also achieve housing justice.

as an attempt to pursue "new and innovative ways to leverage funds to increase production to meet the housing goals," pursued in partnership with The Housing Opportunities Commission (HOC)—the county's public housing agency (Montgomery County, 2021a, p. 1).⁵¹

The focus of the HPF was on expanding housing construction in the county, addressing "a shortage of all housing, but particularly affordable housing" (Montgomery County, 2021a, p. 1). HOC offered low-cost capital to assist with financing the construction of apartment buildings built by private developers, and in exchange, HOC secured a majority ownership stake in the resulting building. The publicly controlled building would then have 30% of units as dedicated affordable housing, with the remaining 70% market-rate. ⁵² The key feature of the "Montgomery County Model" is for the projects of the HPF to be "self-sustaining" and funded by cross-subsidization (Montgomery County, 2021b). Under "cross-subsidy," the market-rate units support the below-market units, allowing for ongoing affordability and ensuring the projects avoid the need for continuous operating subsidy to run the building, as would be required if most of the tenants were low-income. By self-financing via issuing bonds, local and state governments can avoid reliance on scarce and complicated federal subsidy programs (e.g., LIHTC), and the only financial commitment is paying off the debt service on the bonds issued—a relatively low budgetary outlay (Williams, 2023).

Moreover, the HPF operates as a revolving construction loan fund (See Figure 16). Project loans last for 5 years, and once the project is built, the loan is repaid by the initial years of rent collection, freeing up the funds to help finance the next project and allow for continued reinvestment. A main feature of the "public development" approach is the replacement of the high returns that private equity demands of private developers for construction phase loans (15-20%)—these high financing costs can prevent a project from getting off the ground or mean that fewer affordable units are offered—with low-cost public loans (Williams, 2023). Leveraging the fact that the government is not invested in making a profit on these loans and can borrow at significantly lower rates. As such, HOC describes the HPF as "public equity replaces private equity." Furthermore, it frames the public-private partnership model as an ideal balance: "HOC retains majority ownership and control. Public-private delivery model produces beautifully designed, highly desirable developments" (Housing Opportunities Commission of Montgomery County, n.d.-c).

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⁵¹ HOC has a long history of mixed-income development and is perceived as one of the most well-functioning PHAs in the U.S., receiving multiple awards (Housing Opportunities Commission of Montgomery County, n.d.-a).

⁵² "Affordable units" are defined as 20% of units affordable at or below 50% Area Median Income (AMI) and 10% at or below 65% – 70% AMI (Housing Opportunities Commission of Montgomery County, n.d.-c)

The HPF uses municipal debt to provide low-cost construction financing for selfsustaining mixed-income developments

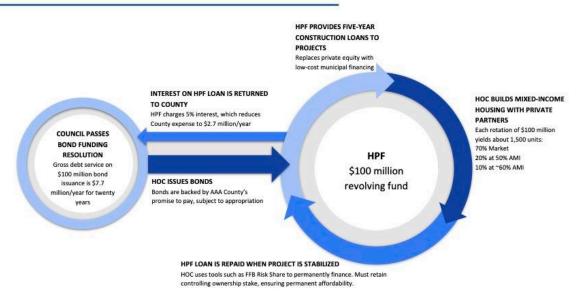


Figure 16 - Graphic describing HOC's Housing Production Fund revolving process. Source: Housing Opportunities Commission.

Notably, the press release announcing HPF explicitly mentions how it takes inspiration from the social housing model used in Vienna: "This mixed-income approach draws inspiration from the Social Housing model used in Vienna, Austria and elsewhere in Europe, which has been employed by HOC in Montgomery County for decades. Repayments will go back into the fund, allowing HOC to draw on them again for new projects ... HOC will leverage its access to publicly owned land to implement the projects through a public-private partnership model" (Montgomery County, 2021b). At first, this seems aberrational, as County and HOC leaders do not make this connection to social housing (or Vienna) in subsequent materials, and both describe the HPF as an outgrowth of the decades of Montgomery County mixed-income programs.

Yet, one interviewee mentioned a more substantive pre-history of how Vienna influenced the "domestic" Montgomery County Model. A staff member with CPE mentioned that:

"When Montgomery County created their program in 2021, it came as a result of a couple of people from Vienna social housing coming to Montgomery County and having a series of meetings with them and learning about how it [affordable housing] works in the United States. They came to a conclusion that this is a way [to do a version of social housing] ... but that has never been publicized. They're not going to talk about that. And I don't really talk about that ... I think the structure of the national affordable housing development ecosystem and tool set is just so different here from the way it is in any

other country. And so, you know, to figure out what to do here that gets different results. You just have to know what environment you're working in here. When these people from Vienna came here, they were like, oh, you should do this, you know, and that's what they did." (Interviewee 12)

One can, in fact, definitively confirm that the Viennese did come to Maryland. On Friday, September 13, 2019, the traveling exhibition of *The Vienna Model: Social Housing for the 21*st *Century* landed in Maryland, USA. The day-long symposium hosted by the University of Maryland School of Architecture, Planning, and Preservation—in partnership with the Austrian Cultural Forum and other collaborators—featured panels with titles such as *Why Is Social Housing Critical Today?*, *Past and Present: Social Housing in Vienna and the United States*, and *The Intersection of Financing, Policy, and Planning: Lessons from Vienna (The Vienna Model: Social Housing for the 21st Century | School of Architecture, Planning & Preservation*, n.d.). According to the agenda, a range of Viennese speakers participated—a member of the Vienna City Council, a co-housing project architect, and the then Director of *Wohnservice Wien*. Furthermore, Hans Riemer, the Montgomery County council member who was then Chair of the Planning, Housing, and Economic Development Committee (and later a key figure pushing for the HPF), spoke on a panel titled, *Why is Social Housing Critical Today? (The Vienna Model: Social Housing for the 21st Century | School of Architecture, Planning & Preservation*, n.d.).

In a video of the event, Riemer opened his speech welcoming the panel by stating, "I am really, really pleased to be here today to join you about learning about this remarkable policy in place in Vienna today" (UMD MAPP videos, 2019). Riemer referenced how Vienna is often named as one of the world's most livable cities and went on to list the various components he hoped to learn from Vienna: "What can we learn from the competitions Vienna uses to create these extraordinary developments? ... I'm also eager to understand how projects are financed, particularly in the public-private developments and how the rents are set and maintained" (UMD MAPP videos, 2019).

Reimer went on to thank a Montgomery County resident, Pamela Lindstrom, for telling him about the exhibit. Lindstrom passed away in 2022, and her obituary describes how she was not just a normal resident, but a commissioner of the Montgomery County HOC who "attended the multinational 2018 "Housing for All" conference in Vienna as the sole American representative, and later arranged for a Viennese delegation to present their program to Montgomery County" (*Pamela Lindstrom Obituary (2022) - Gaithersburg, DC - The Washington Post*, n.d.). Finding such a substantial connection between Vienna and Montgomery County, with all the clear markers of policy mobility—traveling exhibitions, policy tourism to Vienna, a symposium on Vienna social housing where Vienna housing actors presented the model to Americans—was striking considering how unmentioned these connections are in the public conversation about

social housing and the Montgomery County Model. The ties presented above are solely suggestive, as they do not provide any indication of how large a factor Vienna Model policy mobility was in influencing the development of the HOC 's HPF and its revolving fund. As mentioned, HOC already had a long history of mixed-income developments and public-private partnerships. That said, it does, to some extent, destabilize the notion of the Montgomery County Model being fully "domestic" and hints at potential international inspirations.

6.4.2. Domestic Policy Mobility: The "Montgomery County Model" in Motion

Even at its outset, there were Montgomery County councilmembers who forecast that this approach would gain national prominence. In the 2021 press release announcing the HPF, Councilmember Hans Riemer stated, "I am confident this remarkable public private partnership will become a national model" (Montgomery County, 2021b). This rapidly became the case. The Montgomery County Model, as it has come to be known, has received extensive news coverage (Dougherty, 2023; Fayyad, 2024; Ludden, 2024); been written up by housing experts as an innovative model (Goodman & Louie, 2024; "Public Developer Models in the U.S. and Beyond," n.d.); received the 2024 Ivory Prize for Housing Innovation (Housing Opportunities Commission of Montgomery County, n.d.-b); and garnered keen interest from local, state, and national policymakers seeking to copy the approach (Stambaugh, 2024; U.S. Department of Housing and Urban Development, 2024). The HOC webpage for the HPF proudly promotes the list of publications the Housing Production Fund has been featured in (See Figure 17).



Figure 17 - List of journalistic publications featuring HOC's Housing Production Fund

How did this occur? I argue that a major factor has been the policy boosting role of the Center for Public Enterprise (CPE), a non-profit thinktank that has become a prominent actor in the social housing/public development space in the U.S. in a few short years since its creation in 2021. CPE describes its mission as "to grow the role for the public sector in the 21st century economy by helping to establish new public institutions that can overcome today's economic constraints" and "works with local and state government agencies, advocacy organizations, researchers and academics to support successful design and implementation of public goods programs" (Center for Public Enterprise, n.d.). From the beginning, disseminating the Montgomery County Model was a key goal for CPE, and another early point of inspiration was the policy report Social Housing in America, by People's Policy Project (Interviewee 12). CPE, through the efforts of its Executive Director, Paul Williams, and other staff members, promoted the model via the social media platform X (formerly known as Twitter); podcasts (Bloomberg, 2023); national and international conference panels; and testifying to government bodies like the Budget Committee of the United States Senate (Williams, 2024).⁵³ An American housing observer also noted the importance of CPE to popularizing the Montgomery County Model, remarking, "another key reason that the housing production fund model has spread is because of the work of the Center for Public Enterprise" and that the "Center for Public Enterprise is an organization that has become a policy entrepreneur for the Housing Production Fund model" (Preis, 2025).

CPE has deep expertise in housing financial modeling and design, and it has partnered with state-level housing finance authorities (HFAs) and public housing authorities (PHAs) to introduce the new public development model financing strategies. When asked about how the model is being received across the country, Interviewee 12 with CPE noted the importance of being plugged into national policy networks of state-level housing finance agencies and gaining the support of those at "the top of the food chain." Furthermore, the CPE interviewee was quite straightforward in naming the critiques of the LIHTC program, calling it "very convoluted," but also voiced a pragmatism about the difficulty of shifting away from LIHTC in the short-term without a new model built out—like public development. Notably, CPE partnered with both Chicago and Seattle as the cities worked to build out their social housing policy proposals, and both cities took inspiration from the cross-subsidy tool of the Montgomery County Model.

Tenant advocates push back on Montgomery County Model dominance

Though the Montgomery County Model is highly praised, it was not without local criticism. There is a history of housing debates within Montgomery County framed along the YIMBY/NIMBY axis (Graham Vyse, 2020; Ally Schweitzer, n.d.). When the HPF was proposed in

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⁵³ I personally observed CPE staff discuss the Montgomery County Model on a panel when I attended the 2025 International Social Housing Festival in Dublin, Ireland.

2020, the County Executive questioned the wisdom of the scheme on multiple financial and policy grounds, with the projects only providing 30% affordable units being one (Linda McMillan, 2020). In response to the criticisms, HPF proponents emphasized that one should compare HPF's 30% affordability to the lower-to-non-existent affordability that would have occurred in a purely market-rate deal. As well as pointing out that deeper affordability would require a much higher degree of government subsidy than the HPF method employs.⁵⁴

Although Montgomery County and the Center for Public Enterprise do not use the term "social housing," the model is regularly referred to as such in the U.S. social housing debate (Schindler, 2025). This has led to some criticism of the Montgomery County Model from advocates in the social housing space. Tenant-based advocates outline the issues with what they perceive to be an over-reliance on the cross-subsidy financing strategy, with the Center for Popular Democracy report stating:

"While [cross-subsidy] allows financial independence from state and federal funding, less than half of the units produced will be deeply affordable. Instead, legislation can establish financing schemes through grants or progressive taxes to ensure sufficient deeply affordable units for lower-income households" (Amee Chew, 2022, p. 35).

Similarly, another report—jointly authored by PowerSwitch Action, PolicyLink, and Local Progress Impact Lab—argued that relying heavily on cross-subsidization was problematic and pushed back against those who claimed this "mixed-income" approach was inspired by Vienna. The authors wrote: "When citing Vienna as an example of cross-subsidization, any policy proposal must also keep in mind the robust public investment the city has put in its housing system over the last 100 years with the goal of making housing a human right, not a vehicle for profit" (Rosales et al., 2025, p. 25). Cross-subsidy is not uniformly rejected, but the notion that social housing should be "revenue neutral" generates significant pushback from tenant-based advocates, as for these activists, "the whole point of this [social housing] is to get government to buy into a housing system again" (Interviewee 11). These critiques of the Montgomery County Model are also driven by a recognition of its rising popularity and a concern that the concept of social housing is being too closely associated with this specific model and potentially "co-opted" to represent a significantly less ambitious vision that doesn't include a variety of tenant power, environmental, community benefit, labor, and equity standards.⁵⁵

These tenant advocates are looking to "social housing" as a way to address the various failures of existing U.S. housing policies, and while they acknowledge the more easily implementable

⁵⁴ Based on the author's review of a recorded June 22, 2020, Montogomery County Council meeting of the Planning, Housing & Economic Development Committee.

⁵⁵ At the 2025 International Housing Festival in Dublin, I attended a panel with California-based tenant organizers working on social housing who this argument, when explaining why defining social housing is important.

aspect of the Montgomery County Model—particularly private sector partnership and limited on-going government revenue commitment—they argue for a more transformative approach that involves robust public investment, rather than "HOC's approach [that] is a tweak to the system" (Rosales et al., 2025, p. 28). Additionally, some advocates of public housing are critical of U.S. social housing proposals that involve bonds and center middle-income residents, and criticize the middle-income/cost-rent focus for missing the U.S. context, given how severe the housing conditions of low-income households are and the high levels of income and racial inequality (Hackett, 2024).

Proponents of the Montgomery County Model are aware of the criticisms voiced in these social housing reports. In response, Interview 12 with CPE made the counter-argument, "I think what's not understood by a lot of those reports is the fundamental constraint on production for affordable [housing] is that Congress only gives you so much LIHTC and volume cap, and if you're a Housing Finance Agency or housing authority, you [only] get so much subsidy. You have three projects that are proposed, and they claim all of that subsidy for the year, then you're done for the year" (Interviewee 12). Many jurisdictions, like Montgomery County, are oversubscribed and quickly use up all their existing LIHTC, Section 8, and other affordable housing subsidies each year. The additional affordable units from an HPF deal allow the county to create the equivalent of "two extra affordable deals on top that," without having to spend additional (nonexistent) federal money, and "the market units that happen on the side are just, you know, they just have market units on the side." Furthermore, in response to the critiques of the income split, Interviewee 12 went on to say:

"They're [Montgomery County's] not thinking 'Oh, 30/70 is a good split.' They're just like, 'How much affordable units can I get on top of what I'm already doing? Because I already spent all my subsidy. What's the maximum amount I can get?'" (Interviewee 12).

In a similar vein, Interviewee 5, a housing expert from Chicago who worked on Green Social Housing, was clear in their belief that "there's no version of a just housing system that doesn't have a substantially larger proportion of homes not priced by the market than we currently have" and laid out two possible paths to this goal. Either a massive increase in resources from the federal government (with significant ongoing appropriations) or a financially-self-sustaining approach like Montgomery County's. In their analysis, given they did not see any support from federal government funding coming imminently, the Montgomery County Model was the only model they were familiar with "that could be really deployed [in the near term] without a complete revolution in the housing ecosystem" (Interviewee 5). Further discussing how:

"Over the medium-to-long-run [this model], could really change the proportion of homes that are priced by the market without an insane increase in annual

appropriations. Which is not to say that we shouldn't also push for that. We should. [But] in the meanwhile, we can be starting the snowball down the hill." (Interviewee 5).

In jest, Interviewee 5 noted, "You know, crazy things have happened over the last decade. So maybe some good crazy things will happen. But certainly [massive federal investment is] not happening imminently." Thus, embedded in debates over the vision for social housing are different conclusions about the scope of the possible and the likelihood of success for campaigns to win large-scale public investment in the housing system. As well as differences in the time-scale of near-term versus longer-term policy imaginaries.

6.4.3. How is the "Vienna Model" Mobilized in Social Housing Policymaking?

The section provides a schematic overview of the ways the Vienna and Montgomery County Models have been referred to in U.S. social housing policymaking, specifically focusing on Chicago and Seattle. See Davidson (2025) for a fuller overview of how social housing advocacy has intersected with interest groups politics in the United States; particularly, how "key interest groups—including affordable housing developers, tenant advocates, labor unions, market-rate developers, and pro-housing coalitions—shape and respond to emerging social housing initiatives in Seattle, Montgomery County, California, New York, Atlanta, and Chattanooga" (2025, p. 2). Table 7 summarizes the main ways domestic and international housing models were mobilized by housing policy actors in Montgomery County, Seattle, and Chicago. Montgomery County was included as its program preceded the efforts in Chicago and Seattle, and both cities referred to the Montgomery County Model in their policymaking processes.

Chicago Green Social Housing

The origins of the Chicago Green Social Housing (GSH) policy can be found in two tracks. First, within the City of Chicago bureaucracy, there was interest by Department of Housing (DOH) policy staffers to identify new sources of funding for affordable housing production, especially following frustrations with the limits of the city's inclusionary zoning policy and learning about how market-rate developers face private equity financing constraints to greater affordability (Interviewee 5). Before the Vienna study delegation, DOH staff had already begun to read up on the Montgomery County Model and spoke with Montgomery County housing finance officials to better understand the model. Second, advocates and organizers outside the City of Chicago created a coalition in favor of what came to be known as "Green Social Housing," relying much more heavily on international models like Vienna and explicitly using the term "social housing."

A Chicago housing expert who worked on the Green Social Housing program described how, "I certainly did not use the word 'social housing' until Brandon Johnson was elected," and noted the influence of the Illinois Green New Deal Coalition in popularizing the concept locally, given their political ties to the new progressive mayor (Interviewee 5). The Green Social Housing

campaign called for a program that was "in some ways similar to the Montgomery County Model, in other ways was not. I think it was the [IL Green New Deal] political and organizing thread that joined with the internal [Department of Housing] conversations about the HOC model [that led to] the ordinance and the program" (Interviewee 5). Some tensions arose during the ordinance drafting between the city staff and grassroots campaigners. For example, Interviewee 5 noted how, later in the legislative process, the IL GND called for a high degree of tenant control over maintenance decisions in the buildings, a request that city staff deemed infeasible. A compromise was found in providing tenants a seat on the non-profit developer board and the right for tenants to organize at the building level.

During the legislative process in Chicago, the administration officials attending City Council hearings were much more likely to refer to Montgomery County than Vienna, in contrast to grassroots advocates. City staff invited representatives from Montgomery County and the Center for Public Enterprise executive director to speak as witnesses during a City Council hearing on the matter. City staff worked closely with the CPE, given its strong familiarity with the Montgomery County Model, and one housing actor described how CPE enabled them to explain with credibility how GSH's financing and operations would work at "the most granular level" to staff in the city finance, budget, and law departments as well as external validators and potential partners, including state housing agencies and affordable/market-rate developers (Interviewee 5). 56 When asked about how references to the Vienna Model or other international social housing models land with policy actors in Chicago, a Mayor's Office interviewee acknowledged that the "socialist" connotation made it more suspect with certain political actors, and whether the Vienna Model was explicitly mentioned depended on the audience (Interviewee 4). Another Chicago housing policy expert was forthright in describing how they avoided pointing to international models when interacting with the City Council and instead focused on American cities as reference points, plainly stating "The person who represents the area north of Belmont [a street in Chicago] believes that no lessons can be learned from anything that happened south of Belmont" (Interviewee 5).

This points to the parochial nature of American urban policymaking, the strategic nature of communication about urban policy mobility, and the difficulty in uncovering it. Sometimes, explicit policy mobility has its benefits; in other cases, policy mobility by stealth is more advantageous. Davidson (2025) makes a similar point in how the City of Atlanta benefited from the "Cloak of Technocracy"—using the bureaucratic and depoliticized name Atlanta Urban Development Corporation—to avoid the attention of "policymakers who could otherwise view a public entity creating new mixed-income housing as a step toward socialism" (pp. 109–110).

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⁵⁶ A connection facilitated by the fact that the Executive Director of CPE used to work for the City of Chicago Department of Housing (Interview 12).

The name of the non-profit developer in Chicago in the final ordinance was similarly anodyne, the Residential Investment Corporation. In a City of Chicago document that stipulates how municipal bond proceeds are to be used to fund GSH, one can see the dual framing of GSH: a foregrounded comparison to domestic models and a background reference to international models of social housing. The domestic "proven" examples of Montgomery County and Atlanta were explicitly mentioned, while international inspirations are mentioned in passing and in a non-specific manner (City of Chicago, 2024, p. 17). Given that the mayor, Brandon Johnson, ran as a progressive and had the support of various grassroots organizations, this helps explain why the label "Green Social Housing" remained, even if the city staff developing it largely modeled the policy off Montgomery County and avoided more "radical" international references.

Seattle Social Housing Developer

In Seattle, where running a grassroots ballot campaign required voter support and enthusiasm, organizers affiliated with House Our Neighbors (HON) leaned heavily into the radical imaginative potential of Vienna and ran against the American affordable housing status quo (Interviewee 7, 8, 9). In taking their message directly to voters that housing should be a public good and not a commodity, HON was able to make more aggressive arguments. HON leaders clearly stated their points of inspiration, including Vienna, Singapore, Finland, and Montgomery County (Jordan Bollag, 2025). As one of HON's lead organizers noted, "Seattle is the first city in the country to create a social-housing developer through a ballot initiative and to call it 'social housing,'" and the city was the first to pass an excess compensation payroll tax on high earners to provide dedicated funding for social housing (Jordan Bollag, 2025).

It is important to note that HON's aggressive grassroots campaign for social housing led it to become a highly contentious political struggle in Seattle. Generating significant pushback from both elected Seattle officials, business interests, and (initially) existing affordable housing developers who worried a new housing entity would divert scarce resources (Interviewee 6, Interviewee 7). In terms of working with Seattle organizers, a Center for Public Enterprise staff member noted: "frankly ... the ballot initiative campaign to create this public development authority over-promised a little bit on what could be delivered through cross-subsidy and that created a situation where the nonprofit and affordable housing development agencies were like, that obviously doesn't work ... you can't [do] a building full of 30% AMI units [for extremely low-income tenants] without a ton of operating subsidy" (Interviewee 12). Going onto describe how CPE helped to get the affordable development community "back on board" and understand the broader opportunity.

At the same time, securing a dedicated, progressive revenue stream to help fund a new, alternative approach to non-market housing would have been much less likely to pass via institutional legislative channels. HON managed to succeed with the strategy of starting first

with principles and then securing the financing needed for it to be funded. This was also a result of the political context in Seattle, with its progressive political climate and the institutional mechanism of voter ballot measures, unlike in many other U.S. cities. For now, it seems as if Seattle Social Housing is safe, after winning a resounding 63% vote share on the Proposition 1A measure to authorize the payroll tax. But interviewees still expressed significant concern that the political opponents to social housing were strong and organized against the project, biding their time and waiting for the initiative to fail (Interviewee 6). Work has been done to mend some of the fences with the existing affordable housing community, and the securing of dedicated revenue showed that Seattle Social Housing was serious about growing the amount of funding for housing, not simply taking resources away from existing non-profit developers.

Jurisdiction and Model Influence	Framing and Inspiration Points	Financing/Rent-setting Approach	Social Commitments
Montgomery County:	Vienna was mentioned as an inspiration by the lead	The "mixed-income" approach of Vienna	The HOC retains majority
Vienna in the Far Background	Councilmember pushing HPF, and Montgomery County hosted a symposium of Austrian and Viennese delegates in 2019	was referenced as a source of inspiration. The HPF revolving fund also has analogues to the limited-profit housing system approach of a "closed circuit" housing	ownership and control. Permanent affordability is planned for affordable units
	A HOC Commissioner attended the 2018 international "Housing for All" conference in Vienna as the sole American representative. HOC never called the HPF social housing, and instead framed it as an innovative public-private partnership	subsidy system that allows for reinvestment. Cross-subsidy: 30% of units are dedicated to affordable units, and 70% market-rate	Community facilities, labor standards, & green building are not required
	Vienna is rarely seen as a significant source of inspiration, and Montgomery County is seen as a "domestic model" drawn from HOC's years of mixed-income development experience	units. "Cross-subsidy" in the Vienna limited-profit sector, with its cost-rental logic, is achieved by the inclusion of smaller sq. meter "SMART" units that have greater municipal subsidy.	
Seattle: Vienna Forward	Vienna was consistently referenced by the House Our	The "mixed-income" approach of Vienna	Requires: green building and
and Montgomery County Alongside	Neighbors (HON) grassroots organizers. Vienna study delegation in 2024.	was referenced as a source of inspiration	passive house standards; restorative justice conflict
	HON also referred to Montgomery County as a "proven model" of social housing in the United States. Partnered with the Center for Public Enterprise for technical assistance.	Excess compensation payroll tax on high- income earners is reminiscent of the Austrian payroll tax funding structure. Mixed-income cross-subsidy is part of the model but relied upon less than in	resolution for residents prior to eviction; resident participation; forbids sale to private entities; no income recertification
		Montgomery County and Chicago.	The majority of board seats go to advocates/labor appointees
		Cost-rent approach required	
Chicago: Montgomery County Forward, Vienna in Background	During the legislative process, city officials make almost exclusively domestic references. Montgomery County was the main reference point as a "proven model (also Atlanta, GA, and Chattanooga, TN)	Closely models the Montgomery County financing approach, including bonds and a revolving loan fund	Majority RIC ownership. Allowance for creation of advisory elected tenant governance committees; 20% accessible units; veteran
	IL Green New Deal Coalition consistently mentioned Vienna in their campaign. Vienna study delegation in 2024.	Cross-subsidy: 30% of units are dedicated to affordable units, and 70% market-rate units	preference; labor standards The majority of board seats are
	Partnered with the Center for Public Enterprise for technical assistance		mayoral appointees approved by the city council

Table 7 - How the Vienna Model has been mobilized in select U.S. jurisdictions

7. Comparison and Discussion

7.1. Social Housing as an Ideological Project vs. Technocratic Tool

"Social housing" as a political organizing philosophy, an architectural and urban design paradigm, a set of financing principles, a key component of welfare state provision and poverty alleviation, or all of the above? The uses and aims of the concept continue to be contested. I argue that "social housing" in the American context has been used both as a concept to relegitimize the idea of direct government provisioning of housing and a conceptual marker that aims to differentiate this philosophy from traditional affordable housing in the United States. On the intellectual level, it is also an entry point to challenge certain ideas about what housing should be for, that is, to assert the idea that housing a not merely a private matter for the market but a social good. The usage of terms like "decommodification" and phrases, such as "housing as a use value as opposed to an asset," also suggest a radical departure from standard assumptions for the aims of housing in the United States context. While an outright assault on homeownership is rarely presented, as such, there is a deep questioning of the United States' fealty to homeownership throughout the tenant-based social advocacy space—particularly the understanding of a home as a tool for wealth creation and stability.

For social housing advocates that emphasize a broad range of values and principles, "social housing" is a concept that allows them to project what good housing truly would encompass: collective control and co-governance; climate justice and decarbonization; labor protections and worker rights; and highly-resourced community facilities like schools, health clinics, and grocery stores in walkable and transit-oriented communities. Social housing takes on a utopian register, as a vision and a horizon to fight for. As such, these advocates are wary of the "co-option" of the term to refer to a more quotidian set of financing tools and housing development approaches. The primary aim of the "Vienna Model" for this set of tenant-based advocates is not to provide a detailed and technical look at the housing and social policy instruments of *Stadt Wien* (the City of Vienna). Instead, it aims to use Vienna as a mirror to reflect the deficiencies of America's housing system. It is an invitation to imagine a world where housing costs are low and real estate speculation—from the corporate down to the individual scales of homeownership—is not so central to American society.

Other Left YIMBY housing actors in the American social housing space sidestep the term "social housing" and instead prefer "mixed-income, public development." Avoiding the more ideologically charged terminology and more overt political project. Yet adding to the confusion, many observers continue to call the Montgomery County Model and its derivatives "social housing." The more apolitical, less threatening, and under-the-radar nature of the public

development approach is well captured by the headline of a *New York Times* article covering the Montgomery County Model, "This is Public Housing. Just Don't Call it That" (Dougherty, 2023). The public developers' desire for a more active state role in the economy is reminiscent of the New Deal era, ultimately a combination of public policies and private sector actors.⁵⁷ They envision utilizing innovative and novel financing mechanisms that work with, not stridently against, the private market; seeking to harness the market for social ends. These public development actors are more deeply enmeshed in existing policy networks and are seen by mainstream housing practitioners as more "pragmatic." While some in the public development camp are open, in principle, to the policy goals of the tenant-based advocates, most do not see a feasible political or financing path forward for those models and are focused on making incremental progress to address the housing crisis with the tools at their disposal.

7.2. What Actually Can Be Learned from the Vienna Model?

American interviewees consistently expressed a tension between excitement over the operational success of the Vienna Model, and a clear-eyed understanding of the various barriers that exist to developing anything like the Viennese housing system in the U.S., given all the contextual, political, and welfare state differences. Furthermore, with the aggressively reactionary turn in United States national politics, some interviewees admitted these visionary social housing conversations felt cognitively dissonant. Nonetheless, many still saw value in getting exposed to new ideas about housing and specifically seeing the housing system in person, which unlocked another level of meaning compared to just reading about the model or watching videos. Being able to see well-maintained, iconic examples of social housing, robust municipal land banking, and a spatially distributed social housing stock woven into the urban fabric challenged assumptions Americans held about what non-market housing can be.

A U.S. housing policy expert analogized the role of international housing models, like Vienna, to the role references to European healthcare systems play in American universal healthcare debates. Progressive advocates use international examples to argue, "Look, Europe proves that you can do this without necessarily getting super-duper into weeds of well, how does it do this," which can lead to "quasi-imagined, quasi-real" policy models circulating (Interviewee 5, emphasis added). One example provided was the importance many advocates place on individual building-level co-ops where "tenants are completely in charge of the operation of the building" as opposed to the prevalence of more professionalized, large-scale low-profit housing associations "that I have to assume operate very much like corporations" (Interviewee 5). Thus, these international policy models often serve more as a validation of a concept rather than a

⁵⁷ Interestingly, some of the tenant-based proponents of social housing also harken back to the New Deal era, by presenting it as part of a "Green New Deal" (Amanda Michelle Gomez, 2022; IL Green New Deal, n.d.-b). An example of history being mobilized towards different ends and the multiple ways it can be reappropriated.

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concrete program. At the same time, some advocates are actively interested in replicating specific Viennese and Austrian policy approaches in the U.S.—such as cost-based rents, land banking and prioritization of public land for social housing, eliminating income recertification, stronger green building standards, and dedicated, progressive funding sources.

On the prospects of developing social housing in America, one social housing advocate had the following to say regarding the various structural impediments:

"I also think it's not totally wrong to say America is not wired for this. I think it would be hard for everything to stay the same and [for] New York, let alone America, to develop a lasting mass social housing infrastructure ... It won't. We are too real estate-dependent. We are too private property-oriented. We are too car-dependent. We are so many things. Our property tax system runs our municipal governments. There are a lot of things that would have to change, and we don't have a mass movement structure that will sustain it.

So on the one hand, I don't want people to think this is only for there and not for here, but on the other hand, I want us to be clear-eyed about [how] it's not just about passing the right legislation. There's going to be more changes that we need if we expect to see the level of social housing success that they have in Vienna or Uruguay or Singapore or whatever country you want to point to" (Interviewee 10).

The respondent went on to discuss the importance of welfare state barriers, like a poorly funded social security system, and the reliance on asset-based welfare in a homeowner society. Explaining that, "a bad Social Security system means that you cannot comfortably retire on Social Security alone. In an expensive metropolitan area ... people see home ownership as the way to supplement [social security] and not just any homeownership [but] profit-making homeownership (Interviewee 10). I would argue that Interviewee 10's analysis is correct, insofar as housing policy must be thought of in conjunction with other elements of the social welfare state, and merely thinking about one sector (housing) is insufficient for the goals of broader decommodification of core public goods and achieving housing justice.

8. Conclusion

This thesis sought to explore how and why the Vienna Model of social housing is circulating in the United States. Furthermore, it analyzes how it has influenced the emerging U.S. social housing moment despite (or perhaps because of) the significant differences between the housing and welfare regimes in Vienna and U.S. cities. While other international examples of social housing are circulating, I argue that the Vienna Model has had an especially strong reception in the U.S. for multiple reasons. First, Vienna and Austria are notable for their large social housing stock, and Vienna's housing costs are lower than comparable European capitals. Furthermore, beyond affordability, Vienna has been legitimized by the multiple years the city held the top designation as the "Most Livable City in the world" according to The Economist and Mercer rankings (Vienna Tourist Board, 2025). Second, the radical history of Red Vienna and iconic, politically infused buildings, like the Karl-Marx-Hof, project a strong alternative vision for the common good that appeals to tenant advocates and leftists. Yet this history is distant enough not to feel threatening to mainstream, center-left U.S. housing practitioners. Third, the Vienna Model was able to tap into an urbanist imagination of high-quality architecture, in walkable neighborhoods, that is both luxurious and affordable. Communicated in visually striking traveling exhibitions like The Vienna Model and pictures from journalistic accounts. Fourth, the City of Vienna made substantial investments in the informational infrastructure of the Vienna Model, through hosting large-scale exhibitions like IBA Wien: New Social Housing and dedicating municipal staff to international affairs.

The Vienna Model is diverse and varied enough for there to be multiple interpretations, which often align with pre-existing policy orientations. Critics intervene by seeking to debunk its status as an "international best practice" or emphasizing its historical particularity to downplay its replicability in the U.S. context. The efforts of certain social housing advocates to precisely define "social housing" are both a problem definition and a solution definition intervention. Social housing, as proposed by tenant-based groups, enables a conceptual conversation about what a fully idealized version of American public housing would look like. These, potentially utopian attributes, are purposefully included to align around a positive housing vision that tenant organizers are fighting for; transcending a protracted American housing debate narrowly focused on zoning reform and tweaks to existing systems. The social housing framework also recenters the role of the public sector in directly providing housing as a public good, rather than solely distributing incentives and tax credits. Vienna is used as a concrete example to show that the values of a broad-based, non-market housing system can be actualized in a "real place."

For those in the public development camp, social housing offers the opportunity to escape the imposed scarcity of federal housing assistance programs. At a time when conservative forces at the national level are seeking to fundamentally roll back the already hole-ridden social safety

net, social housing on the local level offers an opportunity for constructive action on one of the most pressing policy issues Americans face. Their more "pragmatic" embrace of the market to achieve social ends can be read as either an acknowledgement of the very real and significant constraints local housing policy actors face, or it can be seen as a failure of imagination and boldness to pursue more fully decommodifed housing models. The more entrepreneurial vision of public development also raises questions about what types of logics we expect state actors to be operating under. Embedded in the question of "Does it pencil?" are a series of assumptions about what social resources can, will, or should be made available to non-market housing.

The varying ways that the Vienna and Montgomery County Models were invoked by housing actors in Chicago and Seattle show a strategic use of policy imaginaries depending on the audience. U.S. housing actors understand that citing a policy idea from a "socialist country" can discredit it with some important local stakeholders. Even the distinction between "domestic" and "international" policy models was subtly complicated by the fact that Montgomery County, at least at one point, mentioned taking inspiration from Vienna. Despite the county's model being firmly perceived to be an American policy knowledge object. Now that Chicago's Green Social Housing and the Seattle Social Housing Developer have been passed, and the programs begin operating in earnest, the two cities may become known for their own distinctive social housing policy models, as the years pass and the models evolve. The two could become policy tourism destinations of their own, no longer tied to another city's policy lineage. Thus, the process of policy mobility and mutation churns on, with new policy models begetting more.

To close, during my research, I came across the anecdote that in 1996, the Vienna-based branch of the Austrian far right party (FPÖ) once ran a law-and-order campaign for the Vienna federal state election with the slogan: "Wien darf nicht Chicago werden!" (Vienna must not become Chicago!")—drawing on the city's association with crime and disorder dating back to Al Capone (Darf Wien Chicago Werden?, 2009). In 2025, a reverse Vienna study delegation to the U.S. was another case study of negative policy mobility. Alongside a progressive New York legislator who had previously attended a Vienna study delegation, the Austrian Vice Chancellor, and leader of the Social Democratic party, toured both decrepit New York City apartments and luxury towers with local housing advocates (Jessy Edwards, 2025). Later, he warned his constituents on social media of the American "consequences of profit and speculation over people-housing policy;" cautioned how "in Austria, if we do not oppose this decisively, we could find ourselves in a similar situation in 10 years;" and shared how discussions in New York have "shown that in the United States the importance of social housing is increasingly recognized" and that, of course, the "Viennese model, with its long tradition, is seen as an example" (Andreas Babler, 2025). But perhaps, if all goes according to plan, one day far in the future, a Viennese delegation will travel again to the U.S.—stopping by Chicago, Seattle, or New York—to learn how to become more like the Americans, thanks in part to the "Vienna Model."

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