

Racial Equity and Social Justice (RESJ) Impact Statement

Office of Legislative Oversight

BILL 15-23: LANDLORD-TENANT RELATIONS – ANTI-RENT GOUGING PROTECTIONS

SUMMARY

The Office of Legislative Oversight (OLO) anticipates Bill 15-23 will have a small positive impact on racial equity and social justice (RESJ) in the County. While the proposed rent regulations would disproportionately benefit Black and Latinx tenants, the magnitude of the allowable rent increases could still displace cost-burdened Black and Latinx households. Further, the Bill contains no provisions to prevent tenant displacement. Nonetheless, the Bill could prevent more excessive rent increases that could worsen current racial inequities in housing insecurity.

PURPOSE OF RESJ IMPACT STATEMENTS

The purpose of RESJ impact statements (RESJIS) is to evaluate the anticipated impact of legislation on racial equity and social justice in the County. Racial equity and social justice refer to a **process** that focuses on centering the needs, leadership, and power of communities of color and low-income communities with a **goal** of eliminating racial and social inequities.¹ Achieving racial equity and social justice usually requires seeing, thinking, and working differently to address the racial and social harms that have caused racial and social inequities.²

PURPOSE OF BILL 15-23

Rent regulation policies generally establish how much landlords can increase rents each year. Across the U.S., two states and nearly 200 municipalities regulate their rental market.³ As explained in the “Minneapolis Rent Stabilization Study:”

“The details and implementation of rent regulations vary based on jurisdictional goals. Broadly, these goals include protecting tenants from excessive rent increases, alleviating the affordable housing crisis, preserving existing affordable housing, providing housing habitability and security of tenure for renters, maintaining economic and racial diversity, and preventing real estate speculation.”⁴

The intent of Bill 15-23, according to its sponsors, is to eliminate “excessive rent increases in a way that doesn’t threaten new housing construction” in the County.⁵ If enacted, Bill 15-23 would:⁶

- **Establish protections against rent increases above a threshold for certain rental units.** Annual rent increases for certain rental units in the County would be prohibited from exceeding the “rent increase allowance,” defined as 8 percent of existing rent plus the Consumer Price Index for All Urban Consumers (CPI-U) for the Washington-Arlington-Alexandria Area.
- **Provide exemptions from rental increase restrictions for certain units,** including newly constructed units for fifteen years, accessory dwelling units, certain owner-occupied properties, health facilities, religious and non-profit organizations, and licensed facilities.

RESJ Impact Statement

Bill 15-23

- **Permit rental increases in cases of landlord financial hardship or to fund certain capital improvements.** Landlords subject to the annual rent increase allowance would be permitted to exceed the allowance in cases of undue financial hardship, as determined by the Department of Housing and Community Affairs (DHCA). If granted, the exemption would expire after one year, though it may be renewed annually. Landlords could also apply for an exemption to the annual rent increase allowance through a limited-term surcharge to fund certain capital improvements.
- **Require landlords to submit annual reports regarding rents.** Landlords would be required to submit an annual report regarding “regulated rental units, rents, and notices of rent increases” to DHCA.

Bill 15-23 contains several other provisions, including, among others, administrative requirements for DHCA and requirements for DHCA to submit Method (2) regulations for administering various portions of the Bill.

Bill 15-23, Landlord-Tenant Relations – Anti-Rent Gouging Protections, was introduced by the Council on March 7, 2023.

In September 2021, OLO published a RESJIS for Expedited Bill 30-21, Landlord-Tenant Relations – Restrictions During Emergencies – Extended Limitations Against Rent Increases and Late Fees.⁷ Please refer to this RESJIS for detailed background on racial segregation in housing and the racial wealth divide.

HOUSING INSECURITY AND RACIAL EQUITY

To understand the drivers of housing inequities by race and ethnicity, this statement describes the role of housing segregation in fostering housing inequities in the County and local data on housing security by race and ethnicity. The intent of this overview is to demonstrate that racial and ethnic disparities in housing security are neither natural nor random, but instead reflect the government’s role in creating and maintaining racial and ethnic inequity in housing.

Racial Segregation in Housing. Segregation by race and ethnicity characterizes the housing market in the County, whereby White residents are concentrated in the most affluent communities. Specifically, in 2020:⁸

- White constituents accounted for 69 percent of District 1 constituents (Bethesda, Chevy Chase and Potomac) compared to 43 percent of County constituents. Approximately 6 in 10 District 1 households had incomes exceeding \$150,000 compared to 1 in 10 households that had incomes of less than \$50,000.
- Asian or Pacific Islander constituents accounted for 20 percent of District 3 constituents (Rockville and Gaithersburg) compared to 15 percent of County constituents. Approximately a third of District 3 households had incomes exceeding \$150,000 compared to a quarter of households that had incomes of less than \$50,000.
- Black constituents accounted for 38 percent of District 5 constituents (White Oak, Colesville and Burtonsville) compared to 18 percent of County constituents. About a quarter of District 5 households had incomes exceeding \$150,000 compared to quarter of households that had incomes of less than \$50,000.
- Latinx constituents accounted for 35 percent of District 6 constituents (Wheaton, Glenmont and Aspen Hill) compared to 20 percent of County constituents. About a quarter of District 6 households also had incomes exceeding \$150,000 compared to less than a quarter of households that had incomes of less than \$50,000.

RESJ Impact Statement

Bill 15-23

While some attribute segregation in the housing market to personal preferences and differences in income and education by race and ethnicity, these explanations often ignore the role of systemic discrimination in driving preferences, income, and educational attainment, as well as housing segregation itself.⁹ Moreover, defining housing segregation as a function of personal preferences ignores the role of government in creating segregated communities that begins with the origins of the nation.

Slavery, sharecropping, Jim Crow laws, and the Homestead Act were government policies designed to build wealth among White constituents by extracting resources from Black, Indigenous, and Other People of Color (BIPOC). Government policies reinforcing housing segregation continued with the New Deal as the Federal Housing Administration (FHA) created a platform for wealth in White neighborhoods through providing White residents and developers government subsidized financing to purchase or build homes in White-only enclaves.¹⁰ For example, the Montgomery County Planning Department's Mapping Segregation Project found that White constituents received 400 of 409 Home Owners' Loan Corporation (HOLC) loans made while only 7 were received by Black constituents.¹¹

Racial covenants attached to residential property and the redlining of neighborhoods predominantly occupied by people of color also fostered housing segregation.¹² For example, between 1902 and 1948, Silver Spring enacted more than 50 racially restrictive covenants that prohibited owning or renting "the whole or any part of any dwelling or structure thereon, to any person of African descent."¹³ This included racially restrictive covenants attached to all suburban properties developed in the County by Colonel Edward Brooke Lee.¹⁴ The GI Bill was also implemented in racially exclusionary ways that denied Black veterans loans and reinforced segregation.¹⁵

The growth of Montgomery County was driven by the suburbanization of the Washington Metropolitan region following White flight from Washington, D.C. Housing segregation within the County also reflects the migration of BIPOC families from D.C. to Prince George's County and to the eastern parts of the County, and subsequent White flight from those environs to the western parts of the County (e.g., Bethesda and Potomac). Moreover, given the value of investments in greenlined areas, the value of segregated White housing increased exponentially compared to housing in mixed and predominantly Black areas that were undervalued and underinvested in due to redlining.¹⁶

Today, racial discrimination in housing continues with predatory lending practices targeted to BIPOC communities (e.g. subprime loans);¹⁷ racial and ethnic bias in the rental and real estate markets;¹⁸ and the "implicitly racialized tax code" that favor asset holdings with lower tax rates over income earned, and mortgage holders over renters.¹⁹ Montgomery County's 2015 analysis of the Impediments to Fair Housing Choice acknowledges that housing discrimination in the County on the basis of income source also persists, despite County law that makes such discrimination illegal.²⁰

Data on Housing Insecurity. Local data demonstrates that Black and Latinx households in the County are especially housing insecure, reflective of the larger forces of housing segregation and the racial wealth divide. More specifically:

- In 2021, 63 percent of Latinx renters and 57 percent of Black renters were cost-burdened (expending 30 percent or more of income on rent), compared to 45 percent of White renters and 38 percent of Asian renters.²¹
- Among recent COVID-19 Rent Relief Program clients, 45 percent were Black and 23 percent were Latinx, while 8 percent were White and 2 percent were Asian or Pacific Islander.²²
- Among single adults experiencing homelessness in 2021, 56 percent were Black, 33 percent were White, 5 percent were Native American, and 4 percent were Asian or Pacific Islander.²³
- Among families experiencing homelessness in 2021, 84 percent were Black, 12 percent were White, and 3 percent were Native American.²⁴

RESJ Impact Statement

Bill 15-23

Local data on homeownership also confirms housing inequities by race and ethnicity. In 2021, 77 percent of White and 69 percent of Asian households in the County were owner-occupied, compared to 54 percent of Latinx households and 43 percent of Black households.²⁵

EVIDENCE ON RENT REGULATIONS

Rent regulation is a highly debated issue. While some argue that rent regulations support housing affordability and stability, others argue they harm the housing market in ways that ultimately undermine these benefits.

To help unpack the veracity of these arguments, this RESJIS summarizes the research describing the advantages and disadvantages of rent regulations. This summary of empirical studies is based on a review of reports from researchers at the University of Minnesota (UM), the University of Southern California (USC) and other institutions.^{26,27} Overall, OLO finds the research describing the advantages of rent regulations to be stronger and more consistent than the research describing the potential harms of rent regulation.

Advantages of Rent Regulation. There is strong evidence that rent regulations are effective in *supporting housing affordability and stability* for tenants in regulated units. Studies have overwhelmingly found that tenants in regulated units stay in their homes for longer than tenants in non-regulated units. Further, several studies have found that rent regulations disproportionately benefit BIPOC tenants. For example, a Stanford University study of rent regulations in San Francisco found the regulations had an especially large impact on preventing the displacement of Black and Latinx tenants.²⁸ As noted by the UM and USC researchers, housing stability has proven benefits across multiple facets of well-being, including physical, mental and emotional health, and educational achievement among children.

Disadvantages of Rent Regulation. There is weaker and more inconsistent evidence that rent regulations undermine housing affordability and stability in the long-term because they harm housing markets. A summary of the potential disadvantages of rent regulation noted in the research literature and empirical evidence follows.

Undermine financial stability of smaller landlords. Some stakeholders argue that rent regulations threaten the financial stability of small “mom-and-pop” landlords, however, few studies have explored this topic. Some studies have suggested that mom-and-pop landlords are more likely to charge lower rents and negotiate with tenants, implying they may be less impacted by moderate rent regulations.

Decrease in rental units and increase in rents. Some stakeholders argue that rent regulations undermine housing affordability for future renters by decreasing the supply of rental units. Research findings indicate that rent regulations do not negatively impact new housing construction, especially in jurisdictions where new buildings are exempt. Most studies have also found that rents in non-regulated units stayed the same or were lowered following rent regulations. However, rent regulations may incentivize landlords to remove regulated rental units from the market through condo conversions, redevelopment, or owner move-ins.

RESJ Impact Statement

Bill 15-23

Displace tenants. Some stakeholders argue that rent regulations could undermine housing stability by creating incentives for landlords to evict tenants. This is of particular concern in jurisdictions where landlords are able to increase rents to market rate for new tenants after a unit is vacated (i.e., vacancy decontrol) or where landlords can more easily deregulate units through condo conversions, redevelopment, or owner move-ins. One study found that jurisdictions with vacancy decontrol were less affordable and disproportionately displaced Black tenants.²⁹ Jurisdictions commonly accompany rent regulation programs with “just-cause” eviction protections to limit the legal reasons for which a landlord can evict a tenant. State legislation allowing local jurisdictions to adopt just-cause eviction laws was introduced this year in the Maryland General Assembly.³⁰

Decrease building maintenance and quality. Some stakeholders argue that rent regulations decrease the quality of regulated units by driving landlords to cut costs on maintenance. Evidence is mixed on how rent regulations affect maintenance and quality of regulated units. One study found this impact was largely dependent on the individual features of rent regulation programs.

Distribute benefits inequitably. Some stakeholders argue that the broad application of rent regulations leads to a greater benefit for wealthier households than lower-income households. Evidence is mixed on how the benefits of rent regulations are distributed. While some studies have found that higher-income tenants receive a greater benefit, others have found that lower-income and BIPOC tenants benefit overwhelmingly. Some propose that targeted rental subsidy programs can be a more effective tool of reaching tenants who are most in need of support, however, as noted by USC researchers, policies like these are often not politically feasible.

ANTICIPATED RESJ IMPACTS

To consider the anticipated impact of Bill 15-23 on RESJ in the County, OLO recommends the consideration of two related questions:

- Who are the primary beneficiaries of this bill?
- What racial and social inequities could passage of this bill weaken or strengthen?

For the first question, OLO analyzed the demographics of renters – the constituents who would be most impacted by rent regulations. Census data summarized in Table 1 suggests that BIPOC constituents could disproportionately benefit from the Bill. Black and Latinx households are overrepresented among renter households. Native American and Pacific Islander households are proportionately represented, while White and Asian households are underrepresented. Further, the median household income of renter households in the County was \$72,005 compared to \$117,345 for all households in the County, suggesting that lower-income residents could also primarily benefit from the Bill.³¹

RESJ Impact Statement

Bill 15-23

Table 1: Percent of All Households and Renter-Occupied Households by Race and Ethnicity, Montgomery County, MD

Race and ethnicity ³²	All Households	Renter-Occupied Households
Asian	14.4	12.2
Black	18.0	30.0
Native American	0.3	0.3
Pacific Islander	0.1	0.1
White	55.0	40.5
Latinx	14.3	18.8

Source: Table S2502, 2021 American Community Survey 5-Year Estimates, Census Bureau.

For the second question, OLO considered how this Bill could address racial disparities in housing insecurity. As noted, Black and Latinx households in the County experience higher levels of housing insecurity, placing them at higher risk of displacement. The majority of Black and Latinx renter households in the County are cost-burdened, making them more sensitive to even modest increases in rent. Inflation has caused further financial strain on the budgets of BIPOC and low-income households.^{33,34}

Table 2 illustrates examples of potential increases in rent with the limitations established in Bill 15-23. The increases are calculated based on the minimum rent increase amount (8 percent) established in Bill 15-23. The actual increase amount would likely be larger given the addition of the CPI-U in the rent increase calculation.

Table 2: Potential Rent Change with Bill 15-23 Rent Regulations

If rent is...	Total rent with regulation (8 percent increase)
\$1,000	\$1,080 (+\$80)
\$1,250	\$1,350 (+\$100)
\$1,500	\$1,620 (+\$120)
\$1,750	\$1,890 (+\$140)
\$2,000	\$2,160 (+\$160)

As noted, there is strong evidence that rent regulations are effective in improving housing affordability and stability for BIPOC tenants. Disadvantages attributed to rent regulations that could contribute to racial inequities in housing are supported by more mixed research findings. Table A in the Appendix outlines potential negative consequences of rent regulations and provisions of Bill 15-23 that could mitigate them.

Taken together, OLO anticipates Bill 15-23 will have a positive impact on RESJ in the County. Local data suggests Black and Latinx tenants would disproportionately benefit from rent regulations. Further, there is strong evidence from research that rent regulations are effective in improving housing affordability and stability for BIPOC tenants. The benefit of housing stability to BIPOC tenants will likely encourage positive outcomes across multiple areas of well-being. As such, OLO assesses the benefits of rent regulations exceed the potential negative consequences relative to RESJ.

RESJ Impact Statement

Bill 15-23

If enacted, Bill 15-23 would establish a permanent rent regulation that allows for annual rent increases exceeding \$100 in most scenarios (refer to Table 2). These increases would likely be larger as the Bill includes the addition of the CPI-U in the rent increase calculation. A rent increase of this size would meaningfully constrain household budgets, leaving tenants with considerably less resources to afford housing and other necessities. Thus, the allowable rent increase could offset this Bill's benefits on housing affordability and stability for tenants, especially Black and Latinx tenants, given they are cost-burdened at higher rates. Further, the Bill contains no provisions to prevent tenant displacement. Nonetheless, the Bill could prevent more excessive rent increases that could worsen current racial inequities in housing insecurity. Considering these factors, OLO anticipates the positive RESJ impact will be small.

RECOMMENDED AMENDMENTS

The Racial Equity and Social Justice Act requires OLO to consider whether recommended amendments to bills aimed at narrowing racial and social inequities are warranted in developing RESJ impact statements.³⁵ OLO anticipates Bill 15-23 will have a positive impact on RESJ in the County. As such, OLO does not offer recommended amendments. However, should the Council seek to improve the RESJ impact of this Bill, the following items can be considered:

- **Amend Bill 15-23 to include vacancy controls and other provisions to prevent tenant displacement.** Studies have shown that jurisdictions where rent regulations remain in place after a unit is vacated (i.e., vacancy controls) increased their share of Black and Latinx renters and were generally more affordable to lower-income households.³⁶ Including vacancy controls and other provisions to prevent tenant displacement in Bill 15-23 could help improve its impact on housing stability for Black, Latinx, and lower-income renters in the County.
- **Establish systems for proactive administration and enforcement of Bill 15-23.** As explained by researchers at the Urban Institute, “[d]ecisions about who will govern, administer, and enforce rent control can mitigate or compound existing unequal tenant-landlord power dynamics.”³⁷ To improve equitable tenant outcomes, the rent regulation program could be structured to avoid putting the onus of enforcement on tenants through complaints, and instead establish a reporting and monitoring system that facilitates proactive enforcement. The rental property registry in San Jose, California that tracks controlled apartments, tenancy, and allowable increases through an online portal could be a model for the County to consider.³⁸

CAVEATS

Two caveats to this racial equity and social justice impact statement should be noted. First, predicting the impact of legislation on racial equity and social justice is a challenging analytical endeavor due to data limitations, uncertainty, and other factors. Second, this RESJ impact statement is intended to inform the legislative process rather than determine whether the Council should enact legislation. Thus, any conclusion made in this statement does not represent OLO's endorsement of, or objection to, the bill under consideration.

CONTRIBUTIONS

OLO staffer Janmarie Peña, Performance Management and Data Analyst, drafted this RESJ impact statement.

RESJ Impact Statement

Bill 15-23

APPENDIX

Table A: Bill 15-23 Provisions to Mitigate Negative Consequences

Potential Negative Consequence	Provisions that Could Mitigate
Undermine financial stability of smaller landlords	<ul style="list-style-type: none"> Owner-occupied buildings with up to two dwelling units, accessory dwelling units, single-family homes, and condominiums owned by an individual exempt Landlord allowed to apply for hardship exemption
Decrease in rental units	<ul style="list-style-type: none"> Newly constructed rental units exempt for 15 years
Displace tenants	<ul style="list-style-type: none"> No provisions
Decrease building maintenance and quality	<ul style="list-style-type: none"> Landlord allowed to apply for limited-term capital improvements surcharge to rent

¹ Definition of racial equity and social justice adopted from “Applying a Racial Equity Lens into Federal Nutrition Programs” by Marlysa Gamblin, et.al. Bread for the World, and from Racial Equity Tools. <https://www.raciaequitytools.org/glossary>

² Ibid

³ Edward G. Goetz, et. al., Minneapolis Rent Stabilization Study, University of Minnesota Center for Urban and Regional Affairs, 2021. <https://www.cura.umn.edu/sites/cura.umn.edu/files/2021-08/Minneapolis-Rent-Stabilization-Study-web.pdf>

⁴ Ibid

⁵ “Councilmembers Introduce Tenant Assistance and Protection Package to Address Growing Crisis in Housing Affordability,” Press Release, Montgomery County Council, March 7, 2023.

https://www2.montgomerycountymd.gov/mcgportalapps/Press_Detail.aspx?Item_ID=42982&Dept=1

⁶ Introduction Staff Report for Bill 15-23, Montgomery County Council, March 7, 2023.

https://www.montgomerycountymd.gov/council/Resources/Files/agenda/col/2023/20230307/20230307_1A.pdf

⁷ RESJIS for Bill 30-21, Office of Legislative Oversight, September 9, 2021.

<https://www.montgomerycountymd.gov/OLO/Resources/Files/resjis/2021/Bill30-21RESJ.pdf>

⁸ Demographic Profile of Council Districts, Research and Strategic Projects, Montgomery Planning, 2022.

<https://montgomeryplanning.org/wp-content/uploads/2022/05/Montgomery-County-Council-District-Profiles-2022-1.pdf>

⁹ Richard Rothstein, *The Color of Law: A Forgotten History of How Government Segregated America*, 2017

¹⁰ Ibid

¹¹ “Briefing on Mapping Segregation Project,” Montgomery County Department of Planning, November 23, 2022.

https://montgomeryplanningboard.org/wp-content/uploads/2022/11/Mapping-Segregation-Staff-Report_12-1-22.pdf

¹² Kilolo Kijakazi, et. al, “The Color of Wealth in the Nation’s Capital,” The Urban Institute, November 1, 2016.

<https://www.urban.org/research/publication/color-wealth-nations-capital>

¹³ “DAC Historical Research Notes & Timeline”, Montgomery Planning, Accessed July 21, 2022. <https://montgomeryplanning.org/wp-content/uploads/2020/02/Historical-Overview-and-Development-Patterns-Staff-Research-Paper.pdf>

¹⁴ Ibid

¹⁵ Kijakazi, et. al

¹⁶ Ibid

¹⁷ Keeanga-Yamahtta Taylor, *Race for Profit: How Banks and the Real Estate Industry Undermined Black Homeownership*, 2019

¹⁸ Collection of Fair Housing and Discrimination Studies, The Urban Institute. <https://www.urban.org/tags/fair-housing-and-housing-discrimination>

¹⁹ Dorothy Brown, *The Whiteness of Wealth: How the Tax System Impoverishes Black Americans and How We Can Fix it*, 2021

RESJ Impact Statement

Bill 15-23

²⁰ 2015 Analysis of Impediments to Fair Housing Choice, Department of Housing and Community Affairs.

https://www.montgomerycountymd.gov/DHCA/Resources/Files/community/fair_housing/2015_Analysis_of_Impediments_to_Fair_Housing_Choice.pdf

²¹ Table S0201, Selected Population Profile in the United States, 2021 American Community Survey 1-Year Estimates, Census Bureau.

²² DHHS Pulse Report: COVID-19 Impact and Recovery, Montgomery County Department of Health and Human Services, March 22, 2023. <https://www.montgomerycountymd.gov/covid19/Resources/Files/pulse/DHHS-Pulse-230322.pdf>

²³ "Point in Time Survey," Montgomery County Interagency Commission on Homelessness, Accessed December 5, 2022.

<https://www.montgomerycountymd.gov/homelessness/numbers.html>

²⁴ Ibid

²⁵ Table S0201

²⁶ Goetz, et. al.

²⁷ Manuel Pastor, et. al., "Rent Matters: What are the Impacts of Rent Stabilization Measures?" Program for Environmental and Regional Equity, University of Southern California Dornsife, October 2018.

https://dornsife.usc.edu/assets/sites/242/docs/Rent_Matters_PERE_Report_Final_02.pdf

²⁸ Rebecca Diamond, et. al., "The Effects of Rent Control Expansion on Tenants, Landlords, and Inequality: Evidence from San Francisco," American Economic Review, September 2019. <https://www.aeaweb.org/articles?id=10.1257/aer.20181289>

²⁹ Christina Plerhoples Stacy, et. al., "Rent Control: Key Policy Components and Their Equity Implications," Urban Institute. July 2021.

<https://www.urban.org/sites/default/files/publication/104630/rent-control-key-policy-components-and-their-equity-implications.pdf>

³⁰ HB 0684, Landlord and Tenant - Residential Leases and Holdover Tenancies - Local Just Cause Termination Provisions, Maryland General Assembly. <https://mgaleg.maryland.gov/mgawebsite/Legislation/Details/HB0684?ys=2023RS>

³¹ Table S2503, Financial Characteristics, 2021 American Community Survey 5-Year Estimates, Census Bureau.

³² Latinx is an ethnicity rather than a race. Therefore, Latinx people are included in multiple racial groups throughout this impact statement, unless where otherwise noted.

³³ Jonathan Fisher, "The Impact of Different Inflationary Pressures due to Income Inequality and Racial Disparities in the United States Today," Washington Center for Equitable Growth, May 26, 2022. <https://equitablegrowth.org/the-impact-of-different-inflationary-pressures-due-to-income-inequality-and-racial-disparities-in-the-united-states-today/>

³⁴ Monique Beals, "Nonwhite Voters More Likely to Say Inflation Hitting Them," The Hill, March 14, 2022.

<https://thehill.com/policy/finance/598145-nonwhite-voters-more-likely-to-be-affected-by-spiking-inflation-poll/>

³⁵ Bill 27-19, Administration – Human Rights – Office of Racial Equity and Social Justice – Racial Equity and Social Justice Advisory Committee – Established, Montgomery County Council

³⁶ Christina Plerhoples Stacy, et. al.

³⁷ Ibid

³⁸ Ibid