

Comment on Susan J. Popkin, Mary K. Cunningham, and Martha Burt’s “Public Housing Transformation and the Hard-to-House”

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Abstract

I agree with the underlying premise of the article that it is important for public housing to provide for the housing and supportive service needs of the hard-to-house—to the extent that this is practical and possible. However, I also note some important caveats to put potential public housing and HOPE VI (Housing Opportunities for People Everywhere) support for this population into perspective.

The needs of the hard-to-house go beyond the transformation of public housing. Although Popkin, Cunningham, and Burt are correct in noting that this population requires specialized services, public housing authorities have neither the capacity nor the resources to deliver them. The problem is not public housing or its transformation, but rather the lack of adequate resources for both the shelter and the services that residents require. The diverse needs of this population ultimately demand the coordinated efforts and resources of many public, private, and nonprofit providers.

Keywords: Federal government; Public housing; Urban policy

Introduction

The core thesis of the article by Popkin, Cunningham, and Burt is that public housing transformation as a policy has largely failed to meet the needs of the hard-to-house. This article raises important issues about the scale of transformation efforts compared with the remainder of the public housing portfolio, the success of public housing neighborhoods that have undergone transformation, and the need to have wrap-around services and support for all residents who require help. I agree with the authors on the need to ensure that the hard-to-house get all the services and supportive facilities they require.

However, I believe that the focus on HOPE VI (Housing Opportunities for People Everywhere) as the primary model for public housing transformation and an important component of the system for helping the hard-to-house misses an important consideration of the bigger picture.

Popkin, Cunningham, and Burt define the hard-to-house as “public housing residents who are at risk of losing their housing for reasons that go beyond affordability” (5). Although the authors clearly present the argument that these residents are at greater risk of losing their housing during the relocation and rehousing associated with HOPE VI, the nature of their problems and the instability of their housing are not unique to these sites. Essentially, I argue that the issues noted are not really associated with public housing transformation, but rather with public housing in general. I would further argue that many of these issues confront the hard-to-house in nonpublic housing. The focus on public housing and its transformation is therefore too narrow.

Refining our view of the hard-to-house

We need to examine more closely the specific categories of the residents defined in the article to better understand their housing challenges and opportunities in the context of both their relocation as a result of transformation and their existing housing situations. Popkin, Cunningham, and Burt identify the hard-to-house as households that include persons with disabilities; multiple-barrier residents with criminal justice, substance abuse, education, and/or job readiness issues; elderly households; grandfamilies; large families; and households with an arrest record or drug violations that may subject them to the one-strike regulation.

These categories also need to be examined in terms of their need for particular types of units and dedicated facilities versus their need for social and health services. The task of housing residents with distinct issues and needs often creates very difficult challenges for public housing administrators.

An example is the management challenge of the mixed populations in the senior and disabled developments. Federal law requires that public housing agencies (PHAs) provide housing for these two diverse groups in the same buildings unless the Department of Housing and Urban Development (HUD) has approved an allocation plan. However, the lifestyle of young people with disabilities, particularly those with mental disabilities, is often very different from the lifestyle of the elderly residents and can create conflicts with noise, traffic, and the use of shared facilities. It is also important to note that hard-to-house people with criminal records have admission and continued occupancy concerns that are different from those of the other classifications.

Following is a discussion of the categories discussed in the article. As noted, each of these subpopulations has distinct needs with regard to specialized housing and supportive services. But I include a further consideration of the ways in which these subpopulations interact differently with each other, with the wider public housing population, with PHAs administratively, with HOPE VI transformation efforts, and with the greater housing market. This larger consideration is necessary to assess the degree to which PHAs are appropriate housing providers for significant concentrations of these subpopulations.

Households that include persons with disabilities

There are important differences between the housing and service requirements for residents who are mobility versus mentally impaired. PHAs are required by the Americans with Disabilities Act and Section 504 of the Federal Code of Regulations to modify, under certain circumstances, at least 5 percent of their stock to meet the needs of people with impaired mobility. PHAs are also required to assess the reasonable accommodation needs of their clients and make appropriate modifications to units. This is done in the existing public housing portfolio and achieved via new construction in revitalized developments.

In practice, and counter to the thesis presented in the article, the new construction available under HOPE VI is a more effective and efficient means of building to the needs of people with impaired mobility than retrofitting existing developments. Further, families that include someone with a physical disability *are* relocated to a physically accessible unit.

Generally, public housing residents with mental disabilities do not require special physical modifications to a unit or building. Their needs are best met with professional case management. I agree that the relocation process should include assistance for disabled (and other) households in identifying where support and care facilities are and what transportation systems are in place to reach them. The ability of these households to access this support is not only necessary for relocation, but also necessary for their daily occupancy in non-HOPE VI developments.

Multiple-barrier households

This category, consisting of long-term residents who are of working age but unemployed and without a high school diploma, is the main target of most HOPE VI Community and Supportive Service Programs (CSSP). Such programs are built into the business and fiscal plans of every HOPE VI development and include job training and placement, credit repair, educational

opportunities, and life skills support. The three- to five-year demolition and construction period involved in the HOPE VI sites creates an excellent opportunity to identify and assess the needs of relocated residents and to match and connect them with specific services. Instead of a threat to the stable housing of residents with multiple barriers, the transformation process provides a unique opportunity to better their lives.

Popkin, Cunningham, and Burt recommend transitional supportive housing and SRO units as alternative options for some of the hard-to-house, including some multiple-barrier households. Although I agree that transitional housing is important, the central role of public housing is to provide long-term housing choices for its clients. Several years ago, HUD recognized the different types of housing required to serve the needs of various populations and created a matrix called the “continuum of care,” which included transitional housing. In most discussions of this continuum, as well as in the reality of the assisted housing markets, transitional housing is typically provided by nonprofit and private sector organizations. It therefore seems unlikely that PHAs would become significant providers of this type of housing.

Elderly households

Popkin, Cunningham, and Burt note correctly that “[a]t many public housing developments, seniors have their own buildings (senior housing)” (6), and the argument that seniors need service-enriched housing is valid. I understand that the authors are encouraging the incorporation of physical elements that facilitate independent, living plus services, which many HOPE VI projects currently do, but the larger issue is the long-term delivery of supportive services to this population. Supportive services for senior housing should not be limited only to those developments undergoing revitalization. In addition to HOPE VI, I believe that there should be a special program that allows for capital improvements, unit reconfiguration, on-site social and health facility development, and the delivery of essential services in elderly public housing.

Grandfamilies

PHAs have for years recognized the phenomenon of grandparents becoming the primary caregivers for their grandchildren. The kinship care that grandparents provide to their children and grandchildren eases the pressure on child care and after-school programs. The rules allow grandparents living in public housing family developments to amend their lease to incorporate their grandchildren, and HOPE VI communities do not preclude grandparents

caring for their grandchildren or younger adults caring for their grandparents. Transformation should not affect the ability of grandfamilies to remain in public housing, although Popkin, Cunningham, and Burt are correct in noting that the needs of this type of family should be more fully recognized by public policy.

Large households

Conventional family public housing developments typically have larger housing units in their inventory. To address the supply issue identified by Popkin, Cunningham, and Burt, there should be sufficient funding to maintain and manage units for large families in the public housing portfolio.

Most HOPE VI plans do incorporate unit sizes that meet the needs of the original residents and the general market. In addition, the Housing Choice Voucher Program can serve large households by subsidizing the rents on houses or apartments with multiple bedrooms.

Outside of HOPE VI and the voucher program, we must seek and support new avenues to ensure the creation and preservation of affordable stock that can house large families. But this is a case where I believe that transformation is creatively addressing the problem.

Households with one-strike issues

Residents with one-strike issues have very different concerns than residents in the other classifications. Their needs are not addressed by special housing types or supportive services. Our ability to house them rests solely on the type of crime and the degree of mitigation. Those who have committed sex crimes resulting in lifelong registration as sex offenders and those who have been convicted of producing the very combustible substance methamphetamine on public housing property are precluded by federal law from being admitted. Those who are continuing to engage in criminal activity do not belong in publicly assisted housing. Prison may be the housing of last resort for this population, but they should not be included in a discussion about the hard-to-house.

Those who have a prior conviction but are living productive lives should be able to move into public housing. The article inaccurately states that “federal laws now prohibit ex-offenders from qualifying for public housing” (5). Despite this assertion and similar inaccurate statements made in the Human Rights Watch (2004) study of ex-offenders in public housing, most PHAs exercise great discretion in admissions. Ex-offenders who have successfully served their sentences are eligible for admission into public housing. The

re-entry criteria for HOPE VI developments in the District of Columbia include provisions for ex-offenders after a waiting period determined by the severity of their crime.

Public housing is not the problem...or the solution

I agree with Popkin, Cunningham, and Burt that certain populations desperately require special help, and I would further suggest that the scale of the issue is societal and that the response must be equal in scope. It is no surprise that according to Popkin, Cunningham, and Burt, 62 to 72 percent of the residents at the Chicago site they surveyed were classified as hard-to-house. It is also no surprise that their findings suggest that the problem is common in larger central cities with a history of troubled and distressed public housing. By definition, public housing serves people who have difficulty competing for housing in the private market. Drugs and ill-designed public policies have contributed to the maladies of many public housing residents. Public housing is a convenient focus for the discussion because a disproportionate number of the hard-to-house live there, but this is not solely a PHA or a HUD issue. The needs of the hard-to-house must be addressed at the federal level by the Departments of Labor, Education, Veterans Affairs, and Health and Human Services and at the local level by faith-based organizations, municipalities, nonprofits, and the business community.

Although HOPE VI provides funding for CSSP, this money is limited to the life of the project and cannot support long-term services. At best, funds are used to leverage, develop, coordinate, and monitor other resources. Even at HOPE VI developments where the hard-to-house are provided with suitable units, there is the added need for nonprofit and private service providers to help these households fully benefit from the opportunities associated with HOPE VI. To meet the needs of the hard-to-house, a similar CSSP funding program should be developed for all public housing.

Further, I respectfully disagree with the idea that public housing is or should be the housing of last resort, as posited by the authors. Having public housing serve as the housing of last resort for this population would require PHAs to accommodate even higher concentrations of these particularly needy and resource-consuming groups and create an unacceptable drain on available financial, human, and physical capital.

For example, multiple-barrier households and households that include a person with a mental disability often require significant supportive services to remain in housing and progress toward self-sufficiency. Providing these sorts of services is very expensive and requires large amounts of human resources.

The more public housing is expected to serve large concentrations of households requiring resource-intensive services, the fewer human and financial resources PHAs will have to serve other households.

Moreover, there are management concerns over concentrating households with particular characteristics that often have a negative impact on other types of households. The most obvious example here would be households with members who exhibit antisocial behavior such as loud music, drug use, and other legal or illegal activities that affect neighbors' quality of life. In the private marketplace, such a household would often be evicted (or its members arrested). Responsible public housing managers need to respond similarly and have an obligation to enforce leases in which tenants agreed not to disturb other tenants.

Providing a relatively high quality of life for all residents requires PHAs to maintain a healthy balance of households. Those whose members do not follow the rules need to be removed so other households can remain and ideally continue to progress toward self-sufficiency. PHAs need to be able to serve a healthy mix of household types relative to the human, physical, and financial capital they have available to support the services demanded of them.

Given limited resources, PHAs and society as a whole face difficult choices regarding the mix of households that can realistically be placed in public housing. Households that require disproportionately large amounts of resources effectively displace those with more modest needs. Although I certainly recognize the necessity for public housing to accommodate some subset of the hard-to-house, unless and until housing assistance becomes an entitlement and PHAs are provided with the appropriate resources, there should be a rational balance that enables them to meet the housing needs of other qualifying households.

The focus on HOPE VI is misplaced

Even within public housing, the need for stable housing for the hard-to-house goes well beyond the scope of HOPE VI and other transformation efforts. A PHA's portfolio includes units for families and for the senior and disabled populations in its conventional low-rent program and provides vouchers for both tenant-based and project-based housing assistance. The hard-to-house live in these units and experience the same needs as those in developments undergoing revitalization.

The article uses the \$5 billion allocated to HOPE VI as the basis for the "dramatically changed" (1) policy shift called transformation. Although I believe that HOPE VI is the most important housing program in decades, it is important to note that since its initiation in 1992, over \$224 billion has been

appropriated for public housing subsidies, capital funding, and housing certificates/vouchers. On an annual basis, HOPE VI appropriations account for about 2 percent of the overall funding for public housing programs. And as a matter of policy, HUD has attempted to zero out the HOPE VI program during the past four years.

Consequently, this “transformation” effort, though dramatic in its impact on targeted distressed neighborhoods, has had a relatively measured impact on the industry as a whole. Since only a small percentage of the nation’s 3,400 PHAs have received these grants, most of the public housing population, including the hard-to-house, resides in nontransformed developments.

The primary needs of the hard-to-house transcend housing

The notion that transformation dramatically improves the lives of the low-income residents who return to a revitalized mixed-income community, but throws to the Social Darwinism wolves those not fortunate enough to return misses the important point that for many of the hard-to-house, supplemental services are at least as important in maintaining their housing stability as an affordable, appropriate unit. In fact, an examination of the needs of many of the hard-to-house should focus on the supportive services that enable many of them to stay in conventional public housing (or other housing).

PHAs can modify their facilities, and some have an opportunity to incorporate into their HOPE VI programs those physical elements that support the needs of the hard-to-house. But for an individual or family, the most important consideration is often the delivery of the services required to be healthy and productive. As an architect, I know the importance of supportive physical facilities and the built environment. But the structures and the development of alternative housing only complement the more important availability of social and health services.

Unfortunately, the life skills and job development training, physical and mental health care, substance abuse and domestic abuse counseling, education, and other support that these residents need are typically not fully budgeted for and are often beyond the expertise of PHA management and real estate professional staff. And as noted by Popkin, Cunningham, and Burt and worth repeating here, the responsibility for delivering these services cannot lie only on the doorstep of local PHAs.

In the past 10 years, PHAs across the country have improved with regard to property management, modernization, and real estate development. This progress has been made despite steady reductions in program funding. The targeted resources available for PHAs to provide resident social services have

diminished. The soon-to-be-adopted HUD subsidy allocation system focuses on the cost of managing property without dedicated dollars for resident support. Yet these services are critical to bettering the lives of our clients and have a major impact on PHAs' ability to carry out management responsibilities.

HOPE VI and the hard-to-house

HOPE VI developments are just one part of a multifaceted PHA portfolio. However, HOPE VI revitalization efforts are generally accepted as having dramatically improved neighborhoods and the quality of life for the families that have been relocated back into those neighborhoods. By creating mixed-income communities, HOPE VI has been at least partially successful in deconcentrating the poor in distressed neighborhoods. The hard-to-house living in those developments benefit not only from specific services that meet their needs, but also from services accessible through their integration into the larger community.

In addition, HOPE VI gives rise to public/private partnerships that bring the issues affecting the hard-to-house to the attention of the private sector. HOPE VI projects use federal grant awards to leverage and incorporate private sector funds from developers and financiers to cover total development costs. By virtue of these partnerships, private sector developers must be sensitive to and program for the needs of the hard-to-house residents who return to the revitalized site.

A changed public housing landscape is emerging from federal housing efforts, but the change is hard-won and the funding, deprived. As the federal transformation investment in public housing winds down, PHAs are continuing to learn from the important programmatic lessons of HOPE VI how to rebuild communities. Those lessons include a parallel focus on human infrastructure development and physical "sticks and bricks" infrastructure development.

Popkin, Cunningham, and Burt are correct in stating that the best time for intervention to stabilize the housing situation for the hard-to-house affected by transformation is during the relocation process. Using a case management approach to identify what each family requires allows needs to be matched with resources and services. Such an approach takes time. Case managers must work with families before relocation to establish individualized self-sufficiency programs targeted to their specific needs and potential.

However, suggesting that HUD should require existing HOPE VI grant recipients to adjust their programs to allow for initiatives focused on the hard-to-house is well meaning but naive. Intensive counseling, social services, and special facilities for 62 to 72 percent of relocatees would easily consume

enough of the overall budget to limit the funds available for sticks and bricks and render the project infeasible. I agree with the premise that all of the original residents should benefit from HOPE VI revitalization. However, the underlying mission of public housing remains at the core and demands that we consider the needs of all the residents, not just and not primarily the hard-to-house.

Conclusion

The focus on HOPE VI masks the bigger picture. According to the *HOPE VI Panel Study* (Popkin et al. 2002), half of the residents living in public housing can be defined as hard-to-house. This population requires special social and health services and, in some instances, specific supportive facilities. HOPE VI represents about 2 percent of the HUD budget for public housing programs. In the past four years, funding for public housing has declined by \$1 billion. Realistically, significant funding increases cannot be expected in the near to medium term. Public housing overall, let alone through the HOPE VI program, is ill-equipped to meet the needs of the hard-to-house. Doing so will require the coordinated efforts of a variety of federal agencies and state and local governments, as well as private for-profit and nonprofit actors.

PHAs have generally performed well in providing for the needs of significant numbers of the hard-to-house as a byproduct of the natural composition of public housing residents. However, continuing or increasing the concentration of these households in public housing is not in their interest or that of society in general. To provide for the needs of the hard-to-house population, we need to thoughtfully consider each of the component subgroups in turn and determine appropriate housing solutions.

Some basically need a physical unit to meet their needs, while others require significant supportive services. Focusing on the larger category of the hard-to-house masks the detailed needs of the diverse subpopulations. Further, focusing on public housing and HOPE VI masks the degree to which meeting these diverse needs transcends the capabilities of the public housing infrastructure.

So I return to my core agreement with Popkin, Cunningham, and Burt that meeting the housing and service needs of the hard-to-house is an important goal—one that has not been adequately addressed in the past. But given current and expanded resources, as well as mission and capabilities, PHAs cannot be the primary answer. For my part, I look forward to continuing to be part of the solution. But the diverse housing and other needs of this varied population mean that those of us leading public housing efforts will need many partners.

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