

28.1  
336.18  
468ha

*Handwritten scribbles*

DEPARTMENT OF HOUSING  
AND URBAN DEVELOPMENT

JAN 15 1980

LIBRARY  
WASHINGTON, D.C. 20410

HAA TASK FORCE REPORT  
(edited - October 18, 1967)

--on the mission, operations and organization  
of the Housing Assistance Administration

Department of Housing and Urban Development

HAA TASK FORCE REPORT  
(edited - October 18, 1967)

--on the mission, operations and organization  
of the Housing Assistance Administration

Department of Housing and Urban Development

Chairman, Arthur E. Rosfeld  
ArDee Ames  
William W. Baird  
Arthur J. Gang  
Robert D. Katz  
Vincent A. Marino  
Abner D. Silverman

Staff: Robert C. Hunt  
Dixie Lee Kaufman  
David Yentis

## TABLE OF CONTENTS

Introduction

Chapter I                   The Task Force Recommends a Series of Steps to Sharply Reduce Processing Time and to Increase the Volume of Housing Actually Produced for Low-Income Americans

Chapter II                  The Task Force Recommends a New Effort of Major Dimensions to Improve the Quality of Life in Public Housing

Chapter III                 The Task Force Recommends Lessening Federal Control, Maximizing Federal Leadership, Delegating Operating Authority, Reorganizing the Central and Regional Office Structures for More Effective Housing Assistance

Chapter IV                 The Task Force Recommends that HAA Improve Its Publications and Build More Bridges with the Outside World

Chapter V                  The Task Force Recommends Staff Reorientation, Use of Consultants, Recruitment from Outside to Help Achieve Innovation, Enthusiasm and Imagination in Public Housing Programs

Exhibits

## INTRODUCTION

The Task Force has taken a hard look at the public housing program. In our judgment, here are the essential ingredients for a new and revitalized program:

- \*An organization geared to large volume production of low-rent housing, and blessed with rapid decision-making ability.
- \*A major new emphasis on the social dimension of the program.
- \*A capacity and willingness to innovate.
- \*A far greater involvement of private enterprise.
- \*A willingness to take risks, even to suffer a bloody nose for the sake of a faster-moving, more effective program.
- \*The exercise of greater federal policy leadership, and a sharp reduction in minor procedural supervision and control.
- \*The infusion of new spirit throughout the ranks of the organization.

Significant changes of policy, procedure, philosophy and organization are required to make HAA the flexible and effective organization we envision. The recommendations that follow in the body of this report are addressed to that end.

### To highlight the findings:

We hold that the time has come for the Department to throw all available staff expertise into effecting the reorientation of HAA. HUD specialists in legislation, administration, personnel, research, sociology, design, and other fields should place high priority on assisting the Deputy Assistant Secretary for Housing Assistance to achieve the organizational metamorphosis called for.

In addition, the Task Force feels strongly that crucial policy decisions now must be made at the Departmental level. First--the question of costs. While every effort should be made to search out methods of providing more economical shelter for low-income citizens, we are convinced that HUD should approve realistic and necessary expenditures for providing housing for large families in our major cities. We are sensitive to possible political criticisms of seemingly high housing construction costs, but nevertheless feel the price of building 4, 5 and 6 bedroom units where urgently needed can--and must--be defended.

We recommend strongly:

\*That site acquisition and site improvement costs be judged and weighed separately from construction costs.

\*That when construction costs are comparable within a market area on a bedroom basis that these costs be approved.

Next, we believe the stature of the reconstituted HAA would be enhanced--and a more coherent program approach achieved--if visible linkages connected the low-rent housing program with other programs geared to housing low and moderate-income families.

We also see a need for charting new ways of providing low-rent housing. One new approach is turnkey, which deserves all the backing and support it can get. Another is to experiment with ways of making homeownership possible, and all forms of homeownership, wherever feasible. The report makes some suggestions in that connection.

We speak also of the Department's dual mission, and the conflict that can result. On one hand HUD strives to deliver assistance responsive to a community's need. At the same time, HUD wishes this assistance to be applied in a manner that will achieve specific social goals. The two may not always be compatible.

To HAA itself:

In all matters--except the final approval of major allocations of funds--the Central Office should function to serve the decision-making process in the field. HUD requires reorientation and reorganization. The organization proposed (discussed later in detail) stresses "staff" operation in Washington and "line" operation in the Region. We expect headquarters to develop and communicate policy and guidelines. Compliance with such policy is to be checked through headquarters post-review. For example, one of our recommendations suggests that "Development "Programs" never reach Central Office.

Of equal importance is the need for reorganization of the Central Office to give high priority attention to the need to improve the quality of life in public housing. Our proposal for the creation of a Tenant Services Division is more than a name change. It is both a symbol of the fact that tenant and not management interests come first, and a call for a new series of functions necessary to achieve the goal of responsible citizenship.

Next, the Regional Office:

Here too a major refocus must be achieved. Our reorganization and staffing proposals are designed to arm HAO with generalists capable of assisting communities to utilize a variety of techniques of developing and managing shelter. We want better use made of staff, less time spent on small communities and small programs, more emphasis on creating citizenship among tenants, less attention given to audits, maintenance reviews and broken window panes. In our judgment, HAO should function as an integral part of the HUD Regional Office team. We support all efforts designed to promote closer coordination of Departmental programs. We do urge, however, that the Regional Administrators shall set the policy, define the perimeters--then move out of the way to permit operating personnel to operate.

Furthermore, it is at the field level where we "make or break it" in carrying out the Department's social goals in low-rent housing. A dynamic "outreach" effort is essential if Regional Offices are to provide adequate leadership in making sure that management policies are sensitive to human needs, that project designs are well thought out, and that major state and local agencies cooperate in providing adequate and coordinated programs of social services that meet the residents' needs.

This brings us to the locality--and to the LHA

Just as we recommend that the Central Office delegate most "stop and go" decisions to the Regions, so too do we visualize much more latitude and decision-making locally. But we want HAO fortified with assurances--of local commitment and responsibility.

Generally, the Task Force applauds the development of new methods of providing and managing low and moderate-income housing. We favor placing a Department field representative in the position of saying to a community, "Here is HUD's market basket of assistance programs for low and moderate-income housing. Select the variety most suitable to your needs. Undertake the necessary local actions and accept the necessary local responsibilities. We will do the rest--and see that assistance is delivered rapidly." The larger the variety, the better.

In relation to the market basket approach, we assume we will get out of the business of dealing with "projects" in a locality and shift instead to "programs." A programmed development of sizeable numbers of units will require earmarking or reserving much larger sums. The Task Force has been disturbed by the type of market data currently used for decision-making by HAO. Our report also mentions the need for community profiles that will support and refine decision-making in the field.

We join the ranks of those persuaded that the capacity, style and methods of private industry must be enlisted if sufficient production of economical low-rent housing is to be accomplished. We note, however, that HUD and HAA must insure the presence of adequate markets and surrender some of the customary caution associated with the low-rent program. If HAA is to reach for the hand of volume through the entrepreneur, it must assume some risks. Naturally, we favor courageousness matched with business sense. Nevertheless, we recommend HAA's entry into the faster arena of involvement with the private sector. If the public housing program begins swinging from the heels, the reward might be an occasional bloody nose. We feel HUD and HAA can stand it.

Finally, HAA must now concentrate on outreach and employ initiative on all levels in communicating and planning with other interests that comprise the mosaic of urban concern. In short, the task before HAA is far greater than refining its own procedures, retraining its own personnel, or redefining its own mission. It must become part of the team, working closely with all those who are seeking to improve the urban environment.

For, after all, HAA is in a new ball game.

And so is HUD.

I. THE TASK FORCE RECOMMENDS A SERIES OF STEPS TO SHARPLY REDUCE  
PROCESSING TIME AND TO INCREASE THE VOLUME OF HOUSING ACTUALLY  
PRODUCED FOR LOW-INCOME AMERICANS

Given the acute shortage of housing at the lower end of the income scale, and recognizing the new element of urgency caused by the riots and tension that have swept America's cities, the Task Force believes it is imperative to greatly accelerate the present number of units constructed, and to reduce to a minimum the length of time it now takes to get them built. An acceleration of the leased housing and the acquisition and rehabilitation programs are also essential to the ultimate goal of getting people under roof.

However, it is important to emphasize that the goal is not just greater production, but greater production of units meeting a broad series of related national policy objectives.

HAA could increase production very simply in a number of different ways. It could concentrate on units for the elderly, which are popular and present few cost problems. It could concentrate on building in small communities, where political and financial problems are not as severe. It could concentrate in less urbanized areas, where land costs might not be so high.

We believe, however, that the primary need today is to increase production in large cities as well as small, to increase production of units for large families as well as elderly citizens, and to increase production of units on a nondiscriminatory, nonsegregated basis as well as to help revitalize existing ghetto areas.

The Task Force recommends a series of steps which we believe would greatly expand production of the kind of units urgently needed today and which would reduce Federal processing time by up to 50 percent. They include:

- \*A request for emergency increased authorization of funds, which in itself would constitute a powerful motivation to greater productivity.
- \*The establishment of new, more realistic and separate ceilings for both land and building, the latter based on comparable costs (on a square foot or bedroom basis) for a given market area.
- \*The delegation of all but final ACC approval authority to HAO; and the elimination of HAA project reviews except in special circumstances.
- \*The shift of critical "stop-and-go" decisions to the earliest possible stage in the development process.

- \*The elimination of all HAO reviews of project plans after the schematic stage and before the submission of final working drawings.
- \*The reorganization of HAA-HAO to create new and cohesive administrative units responsible solely for production.
- \*The examination of all units now in the pipeline, to convert as many as possible to turnkey.
- \*The termination of all program reservations now in the pipeline which have shown no signs of reasonable progress and offer no prospect of being placed under construction or converted to turnkey in the near future. This should be done on a continuing basis.
- \*The establishment of a new system of priorities for processing applications, which would give great weight to its capacity for rapid completion.
- \*The development of a "community profile" for the major urban areas--a compendium of key items of information--which would permit rapid and informed decisions related to the allocation of resources for stepped-up production. (Exhibit No. 7)
- \*Modification of present policies on payment of LHA administrative expenses to withhold a portion (perhaps 50 percent) of the requested increase in development program expenses until the units are actually occupied, so as to provide an incentive for faster progress.
- \*High priority examination of ways to stimulate faster progress with the leased housing program, including private owner motivations and profit considerations, and the possibility of greater initiative by LHA's in finding potential lessors.

### The Exhibits

It should be emphasized that the above listing of recommendations provides only the barest highlights. The supporting analyses and elaborations of these recommendations are contained in Exhibits 2 and 3.

These exhibits are essential components of the Task Force Report.

Exhibit 2 deals with the pipeline.

Exhibit 3 deals with steps to increase production.

## Recommendations

Here are some specific steps which we believe would greatly streamline and reduce Federal processing time:

- \*LHA's should be clearly informed of information required in the initial application. The application should show how the proposed project is related to other local housing plans and programs.
- \*A definite indication from the locality of the acceptability of the specific site, and preferably the general areas in which specific sites would be acceptable. It is essential that firm site decisions be made at the earliest possible stage.
- \*Increased preliminary loan funds should be made available for such items as (a) site surveys and borings, (b) preparation of schematic plans, and (c) land options. These actions should be gotten out of the way as early as possible, prior to awarding the ACC.
- \*The applicant, whether an LHA or turnkey developer, should be given a clear indication of the "cost ceiling ballpark" for the particular project being proposed, based on the individual "package" being proposed and on comparable cost figures for the market area.
- \*The schematic drawings should be carefully reviewed, with all recommendations for modification made at that time.
- \*Based on the cost ceiling and the design changes required, the applicant should be given a free hand to proceed as fast as possible to final working drawings, without any further second-guessing by HAO unless requested.
- \*HAA review of project applications, except in the case of unusual pacemaker projects, should be eliminated, and full responsibility should be delegated to HAO except for final approval of the ACC.

II. THE TASK FORCE RECOMMENDS A NEW EFFORT OF MAJOR DIMENSIONS  
TO IMPROVE THE QUALITY OF LIFE IN PUBLIC HOUSING

The Task Force firmly believes that just as important as increasing production is the urgent need to improve the quality of life in public housing.

If the housing produced does not make any significant contribution to the social and economic needs of those served, then it will not make much sense to build "bad" housing faster.

In the past, the public housing program has operated on a "roll-over" basis, so that the housing would always serve the desired segment of the low-income population. This has led, however, to a series of management practices which have had serious consequences on the individuals and families involved. In some cases, the reward for economic advancement has been a rent increase or an eviction notice.

We believe the program must take the individual as its starting point, and build a program tailored to the needs and desires of those being served.

This means:

- \*A program that strives to achieve a decent home in a suitable neighborhood living environment, rather than a temporary way-station for those who have no alternative.
- \*A program that provides maximum opportunity for social and economic advancement of the residents.
- \*A program that does not build in disincentives to such advancement.
- \*A program that makes maximum contribution to every individual's sense of human dignity, with minimum invasion of personal privacy.
- \*A program that meets the elemental need for personal safety.
- \*A program that provides for a voice by residents in their own destiny, a means for settling grievances fairly, and the opportunity for responsible citizenship through meaningful participation and involvement in the affairs of the program.

The achievement of these goals will require new leadership at all levels, especially at the Federal level.

The Department has been making steady progress in reorienting the policies and objectives of the public housing program to make it more responsive to the people it serves. A recent example is contained in the memorandum from Mr. Fletcher to Assistant Secretary Taylor of

August 8, 1967, "Program for Upgrading Low-Rent Housing Projects" (Exhibit No. 4) which the Task Force endorses and urges prompt implementation.

Regional Offices and LHA's have also become increasingly sensitive to the social dimension of the program.

But it is no longer enough, we believe, to equate leadership with recognition and acceptance of desirable social goals.

The urgent need today is for leadership at all levels which is imbued with an "outreach" attitude and which seizes the initiative to make sure that the projects are designed and managed, and that services are provided, so as to give the goals a chance of becoming reality.

With respect to leadership by the Department, every effort should be made to enunciate the recommended national goals and social policies as forthrightly and firmly as possible. Intensive educational and retraining programs should be initiated, through speeches, conferences, position papers, informal discussions with key members of HAA's public, and the like.

In addition, as discussed in another section of this report, we propose a significant restructuring of the organization and functioning of the Central and Regional Offices to provide the capability and impetus for greatly expanded efforts to carry out the new social mission.

#### Recommendations

Following are our recommendations to help carry out the goals discussed earlier:

##### To achieve a good home and decent environment--

1. A \$25 million modernization program, with emphasis on improvements to make existing projects more livable, with attention to the participation and possible employment of project residents.
2. A policy to insure that sites are selected where adequate schools, commercial and transportation facilities are available and where residents will receive the necessary assistance to meet their employment, educational, health, and homemaking problems.

3. A program to encourage commercial activity within the project where neighborhood services are inadequate, with attention to the possibilities of linking such facilities with job training and employment opportunities for residents.
4. Consideration to ways of encouraging better care and maintenance of projects through financial incentives to residents.

To provide opportunity for social and economic advancement--

1. A policy giving priority to applications providing evidence of participation by other agencies in the planning and provision of well-rounded social service programs.
2. A greatly stepped-up staff effort by HAA-HAO to work with other Federal, State, and local agencies in the provision of needed services.
3. A request for legislation to provide the Department with a new and separate fund of \$20 million to provide expanded social services to public housing residents in communities with critical need.
4. Strong encouragement to LHA's to serve as active referral agents, and to provide employment opportunities through counseling, job training programs, and the provision of jobs for residents in project management.

To eliminate disincentives to individual advancement--

1. A policy strongly urging LHA's to define net income in terms of receipts by the principal recipient of income, excluding casual, uncertain, and intermittent earnings of other members of the family, particularly minors.
2. A policy urging LHA's to make maximum use of the provision permitting over-income families to remain in occupancy when genuinely suitable alternative housing is not available on the private market.
3. A request for legislation eliminating the requirement that there be a 20 percent gap between the rental limits for admission to public housing and the lowest unsubsidized rents at which the private market is providing a substantial supply of decent, safe, and sanitary housing for low-income families.

To enhance individual dignity and protect privacy--

1. A policy of reviewing existing management rules and regulations, with the aim of urging LHA's to eliminate all unnecessary restrictions and requirements as to what tenants may or may not do.
2. Support for legislation allowing the sale of any units (rather than only detached or semi-detached dwellings) where feasible, in order to encourage homeownership.

To provide for personal safety--

A policy of encouraging greater police service, automatic entrance control devices, and the formation of resident committees to greet visitors, answer questions, and when necessary, discourage unauthorized persons from entering the building or loitering in the lobby.

To settle grievances and give residents a voice--

1. A policy urging LHA's to establish an equitable grievance procedure, and to prevent evictions without explaining the cause.
2. A policy giving maximum support to the establishment of tenant councils and similar organizations.
3. A policy giving full guidance and illustrative information on appropriate roles tenants might play in the establishment of management policies and regulations, with encouragement of their maximum participation and involvement.

In addition to the above recommendations, the Task Force believes that an additional subsidy of \$120 per unit per year for families with large numbers of children and other families of unusually low income with special strains on the family budget, as now provided for elderly families as well as those displaced by governmental programs, should be provided.

III. THE TASK FORCE RECOMMENDS LESSENING FEDERAL CONTROL,  
MAXIMIZING FEDERAL LEADERSHIP, DELEGATING OPERATING  
AUTHORITY, REORGANIZING THE CENTRAL AND REGIONAL OFFICE  
STRUCTURES FOR MORE EFFECTIVE HOUSING ASSISTANCE, AND  
INVOLVING LOCAL GOVERNMENTS IN FINANCING LOW-INCOME HOUSING

One of the important objectives of the Task Force has been to seek ways of reducing Federal control and supervision of the day-to-day, routine aspects of the low-rent housing programs, of delegating authority for operating decisions to the extent practicable with sound program administration, and of devising a Central and Regional Office structure more responsive to the goals of increasing the production of housing for low-income Americans and improving the quality of life in public housing.

At the same time, we believe it is extremely important that HAA provide much more vigorous leadership and direction with respect to major policy objectives.

There should be less Federal involvement in reviewing minor construction change orders, or approving office equipment budgets, or conducting unnecessary audits. But there should be far greater leadership to make sure that the program meets the social and economic needs of the residents, that residents have a meaningful role to play, that LHA's are geared to produce and move rapidly in developing projects, that they will vigorously pursue new techniques, programs and innovative construction methods.

Another way of drawing the distinction: HAA should concern itself less with the means and more with the ends, less with how it is done and more with what is done, less with manual procedures and more with policy guidelines and performance standards.

The style and image of the new leadership recommended should be developed in many ways--by cutting "deadwood" from the pipeline to emphasize that a business-as-usual approach is no longer acceptable, by setting demanding standards of performance for HAA-HAO and expecting the same from LHA's, by forceful speeches, by enunciating policies with firmness and clarity, by undertaking visible innovations, and by employing whatever tools and sanctions are available to insure maximum possible compliance with the Department's major policy objectives.

The Task Force was also impressed with the considerable duplication of processing and review functions as between the Regional Office and Central Office. In our view, sound administration of the program reservation and development program functions requires a maximum amount of delegation to the field, leaving HAA free to concentrate on program planning and policy formulation. In the case of management, we believe that the time has come for the locality to shoulder the responsibility for administering completed projects in accordance with policies and practices designed to accomplish the objectives of the program. Accordingly, all operating responsibilities of HAA with regard to production of low-rent public housing, except for the allocation of funds and the announcement of approval actions should be delegated to the Regional Offices.

## Recommendations for HAA Reorganization

The considerations underlying the Task Force recommendations on HAA reorganization recognize the need to achieve major shifts of emphasis in the low-rent housing program. These include:

- \*The need to streamline and greatly expand HAA's capability to increase the volume and rate of housing production.
- \*The need to greatly strengthen HAA's effort to insure that the program promotes responsible citizenship and serves the social and economic objectives of this Administration and Department.
- \*The need to stimulate all forms of innovation--from new programs and techniques to new methods of construction--to achieve housing for low-income families in the quantity and quality desired.

Our organizational recommendations are expressly designed to help carry out these objectives.

We propose:

- \*A Program Development Division with lead responsibility for
  - Research and development in new innovations in the low-rent housing field.
  - Coordinating the development and issuance of policies, procedures, standards and guides for the programs assigned to HAA.
  - Advising the Deputy Assistant Secretary on the effectiveness of the various programs--turnkey, leasing, acquisition and the conventional programs to achieve their maximum potential and to assist him in taking actions to achieve greater production or responsiveness to needs through new legislation or program policy and procedure.

Research and development functions would be vested in a new Research and Technology Branch within the Division and the other program development functions in a new Program Policy Branch.

- \*A Production Division to lend maximum organizational support to the objectives of increasing production. This Division would have the responsibility for serving the Deputy Assistant Secretary as the central inspection center with respect to overall program status; Regional Office progress and problems;

for monitoring program activity in the Regional Offices and serving those offices as an expeditor of necessary headquarters activity; for analyzing conflicts between LHA's and Regional Offices or between Regional Office and Central Office staff and making recommendations on the resolution of such conflicts; identifying gaps in established program policy and procedure and recommending modifications on the basis of operational experience.

\*A Tenant Services Division to provide greatly expanded leadership in making sure that public housing projects make maximum contribution to the goal of responsible citizenship and the objective of meeting the social, economic and human dignity needs of project residents.

The Division should reflect a pervasive concern for the social implications--the impact on people--of housing management policies and practices.

The Division would have a number of new functions and responsibilities: to provide leadership and guidance in the preparation and effective dissemination of appropriate social goals and guidelines; to assist in educational and training efforts necessary for HAA-HAO-LHA personnel in achieving such goals; to assist the RHA in developing plans and programs to increase the participation of other Federal agencies in meeting social and economic needs of public housing tenants; to help break bottlenecks at the Federal level to the achievement of coordinated local programs; and to conduct post-reviews of general management practices.

\*The reorganization of present Housing Development and Management Division functions, with emphasis on the new missions and orientation they should have and with clear instructions that the functions should be staff rather than line responsibilities.

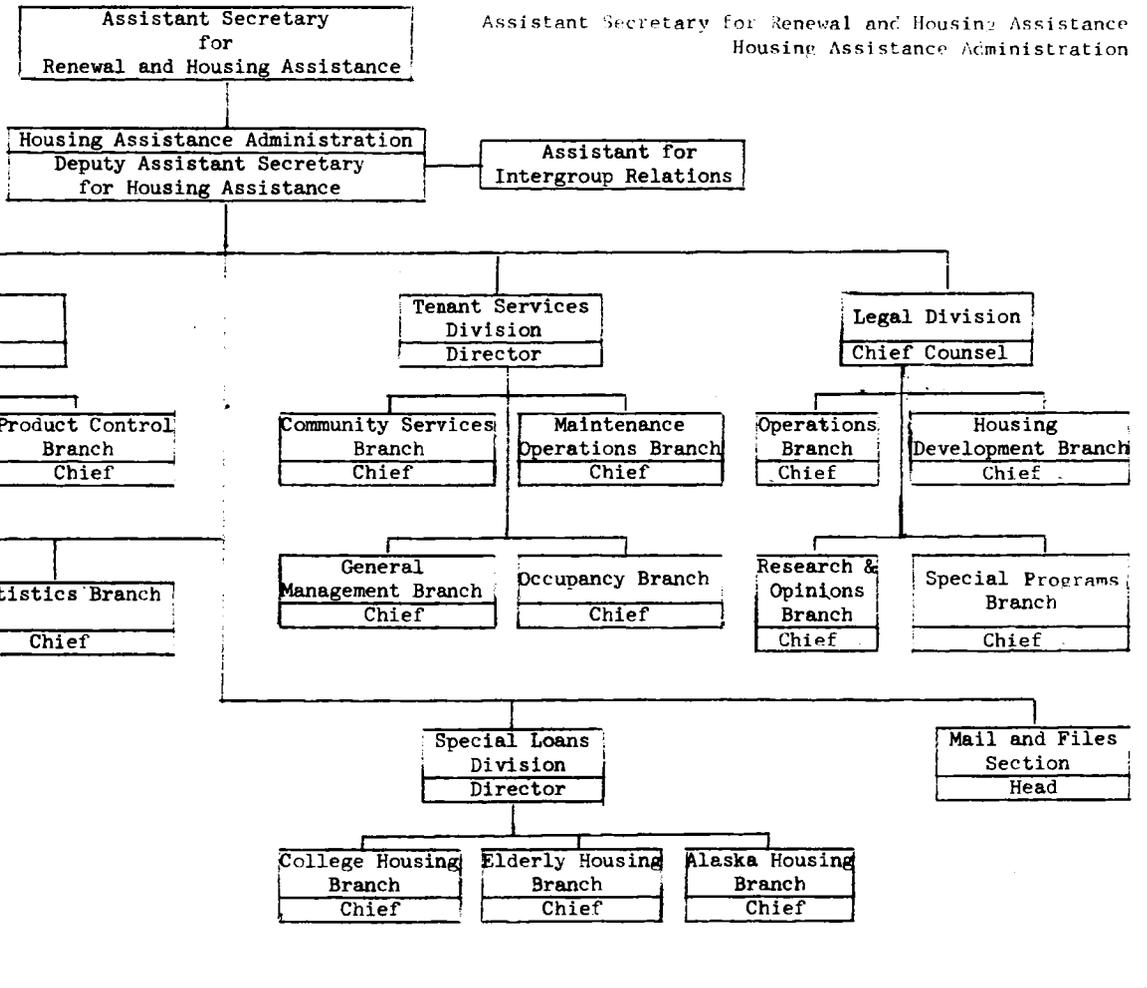
\*A Technical Services Division with supporting service functions similar to those of the present Design Services Branch, Housing Development Division.

\*A Special Loans Division with a College Housing Branch, an Elderly Housing Branch, and an Alaska Housing Branch. The first two branches would perform supporting service functions similar to those performed by existing counterpart branches and the third would perform such services when the new Alaska Housing Branch is implemented.

\*A reorganization of the Legal Division with four branches:

- An Operations Branch concerned with procedures for application reviews, appeals for decisions of Regional Counsel, training of Regional Office legal personnel, and post review of Regional Office legal decisions.
- A Housing Development Branch concerned with legal aspects of eligibility of applicants' sites, costs, and activities; occupancy regulations; contracts; financing and labor regulations.
- A Special Programs Branch concerned with legal aspects of college housing and elderly housing loans, equal opportunity in employment and civil rights regulations.
- A Research and Opinions Branch concerned with the novel questions of law, compliance matters, state legislation, drafts of Federal legislative proposals, and litigation.

TENTATIVE



Recommendations for Reorganization of Regional Housing Assistance Offices

The Task Force concluded that the present organizational structure for housing assistance functions in the Regional Offices is inadequate to effectively increase the volume and rate of housing production or to promote the social and economic objectives of the Department because of:

- \*Fragmentation of program responsibility and over-specialization of personnel within each HAO.

- \*Blurring of organizational responsibility for promoting good citizenship and meeting the social, economic and dignity needs of low-rent housing tenants.

The Task Force believes the organization for housing assistance functions in the Regional Offices needs to be structured in such a way as to give forceful and visible form to efforts necessary to correct these deficiencies.

We propose:

- \*A Production Division similar in purpose to the RAO Field Service Division and the MDO Program Field Service Division. This Division should be staffed with Housing Assistance Representatives--generalists who are competent to recognize the housing needs of localities and encourage the use of any low-rent housing programs that will best meet those needs. The Division should serve as a central point of information for community groups and applicants regarding all low-rent housing programs, including turnkey, from the time of pre-application conferences to project completion, and be responsible for surveillance and expeditious handling of the project, including assisting where necessary in resolving technical difficulties. The Housing Assistance Representatives should operate on a geographical basis within each Region.

The Division should also contain:

- A centralized Processing Control Branch controlling, coordinating, and scheduling the processing of program documents.

- A Land Branch responsible for advisory and appraisal review functions in all HAA programs.

\*A Technical Services Division responsible for review of architectural, engineering and construction aspects of all HAA programs.

\*A Tenant Services Division responsible for advice and guidance to LHA's in the provision and use of community facilities and social services, interagency liaison in these areas and related research and training activities; management operations; resident eligibility and occupancy; maintenance; accounting; and fiscal matters. This new HAO Division, like the new HAA Tenant Services Division, should reflect a pervasive concern for the impact of housing management policies on people.

\*A Special Loans Division responsible for the College Housing and Senior Housing Loans Programs.

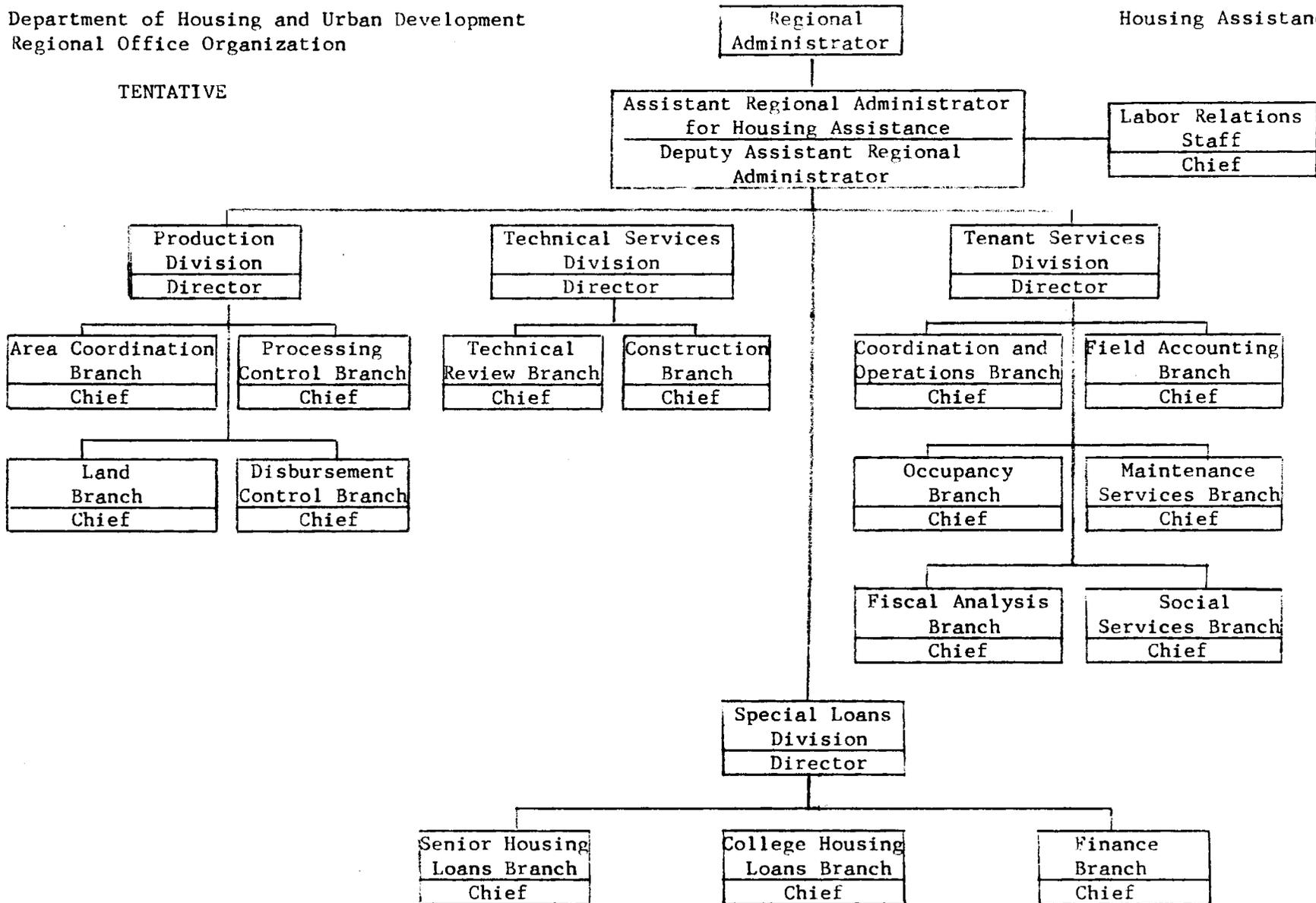
#### Senior Citizens Housing Direct Loan Program

Transfer the Field Engineers in the MDO to HAO. Approximately 85 percent of the present workload and funding of the Field Engineers is from the Senior Housing and College Housing direct loan programs. Direct operational responsibility of the MDO Field Engineers should be given to the office which has the primary interest in the functions of the Field Engineers.

Department of Housing and Urban Development  
Regional Office Organization

Housing Assistance Office

TENTATIVE



IV. THE TASK FORCE RECOMMENDS THAT HAA IMPROVE ITS PUBLICATIONS  
AND BUILD MORE BRIDGES WITH THE OUTSIDE WORLD

## Recommendations for an Improved Information and Communications Program

The Task Force believes it imperative that HAA initiate a well-planned information and communications program for the benefit of employees and other carefully identified groups and individuals of immediate or potential importance to the mission of HAA.

We recommend:

- \*That a private firm, expert in communications, be retained to reorganize, recast and redraft existing publications (such as fact sheets, guidelines, and other publications aimed at the general public) as well as directives (such as the low-rent manual) and advisory material (such as the management handbooks) aimed at HUD employees, LHA's, and participants in other HAA programs. Part of this job would be to assure that while each piece would be written so as to supplement others when necessary, it would nevertheless be, as recommended by the proposed HUD Unified Issuances System, self-contained, and not function as addenda to other coded releases or issuances. Further, such pieces would reflect the new procedures and emphasis suggested in this report, and all directive and advisory material (excepting the publications) would be part of the proposed HUD Unified Issuances System.
- \*Holding periodic informal seminars or workshops with outside experts and observers. (These could be organized around such topics as social problems, physical design, civil rights implications, or builders' beefs.)
- \*Establishing an informal "braintrust" group of outside experts who might be effective in providing informed advice on significant policy problems facing HAA top staff.
- \*Engaging outside consultants on sharply defined, short-term research assignments in as many activities as possible, as a means of focusing staff attention on the problem, and building bridges between them and the outside world.
- \*Encouraging parallel activities in the Regional Offices, with occasional conferences in Washington for Regional Office personnel, including roundtable discussions with selected outside experts.

## Involvement of Private Enterprise

It is our strong belief that the involvement of private enterprise, based on profit motivation, is essential to any significant breakthrough in meeting the housing needs of low-income Americans.

Increased participation of the private home building and real estate industry in such areas as turnkey participation, project management, and research and development on industrialized housing should be encouraged. This encouragement should involve both private and public agencies in area workshop conferences at which new procedures are explained. Staffing arrangements should be made so that after such meetings are held, effective follow-through can be achieved.

An intensive examination should be undertaken by the proposed HAA Program Development Division of the problems, needs, and capabilities of private developers, so that programs can be more carefully tailored to generate their maximum participation. For example, the possible need of large developers for a continuing market in order to justify any involvement at all should be explored, as well as the impact of processing times on profit potentials and the profit potential in relation to the risks involved.

We also urge that HAA's exploration of the private sector not be limited to linkages with only those firms and organizations enjoying a reputation of experience in a given field. For instance, we would hope that pilot programs in private management not be restricted to existing real estate or management firms--but, that other organizations of competence in any area be asked to take a fresh look at the challenge of generating good citizenship among low-rent residents.

V. THE TASK FORCE RECOMMENDS STAFF REORIENTATION, USE OF  
CONSULTANTS, RECRUITMENT FROM OUTSIDE TO HELP ACHIEVE  
INNOVATION, ENTHUSIASM AND IMAGINATION IN PUBLIC  
HOUSING PROGRAMS

One of the most important needs in the Central and Regional Offices is for innovative people of imagination and enthusiasm who are interested in adopting new approaches and moving in the new directions set forth in this report. Without such people, we feel that our recommendations may well be lost in the good, gray fog of conventional bureaucracy.

Thus, effective training and educational programs are essential. Where necessary, consultants should be hired from outside the Department to conduct classes designed to orient selected staff to concepts emphasizing social service and production. After training, cadres of such personnel should be formed and assigned to Central and Regional Office operational and staff organizations in order to assure sensitivity to the new directions throughout the organization.

LISTING OF EXHIBITS

- Exhibit No. 1            Notes on Method of Approach of HAA Task Force
- Exhibit No. 2            Report on the Pipeline
- Exhibit No. 3            Detailed Recommendations on Reducing Processing  
Time and Increasing the Volume of Low-Income  
Housing
- Exhibit No. 4            Memorandum from Deputy Assistant Secretary for  
Housing Assistance to Assistant Secretary for  
Demonstrations and Intergovernmental Relations,  
"Program for Upgrading Low-Rent Housing Projects,"  
August 8, 1967
- Exhibit No. 5            Comparison of RAA and HAA Personnel -  
Relative Distribution by Grade, Age, and  
Length of Federal Service
- Exhibit No. 6            Statutory Requirements for the Low-Rent  
Public Housing Program
- Exhibit No. 7            Memorandum from Task Force Chairman to  
Director, RHA Plans, Programs and Evaluation,  
"Community Profile," August 24, 1967

The Task Force was convened for seven weeks, investigating all aspects of the mission, organization, and operation of HAA.

The Task Force is genuinely grateful to all those individuals who assisted in fulfilling this charge.

The National Association of Housing and Redevelopment Officials responded by forming a special ad hoc committee. This group deliberated several days itself, met with the Task Force, and submitted a report on the reorientation of housing assistance programs.

The Executive Directors of the National Capitol Housing Authority and the Chicago Housing Authority arranged for the Task Force to visit a number of public housing projects.

In addition, the Task Force held countless discussions with HUD employees. This included many Regional Office staff members who were consulted when the Task Force spent several days in Region IV. The Task Force also had the opportunity to meet with all seven Assistant Regional Administrators for Housing Assistance in Washington. They cooperated to the fullest. The Task Force is especially grateful for the support and close involvement of the Secretary, the Under Secretary, Assistant Secretary Hummel, Assistant Secretary Ink, and Deputy Assistant Secretary Fletcher. Special thanks too, to HAA principal staff, Leonard Duhl, Tom Rogers, Arthur Tackman and Charles Dieman.

REPORT ON THE PIPELINE

SUMMARY

The facts An analysis of the pipeline reveals the following facts as of June 30:

\*The median pipeline time is 44 months.

\*Total number of units in pipeline is 228,761.

\*Annual Contributions Contract funds are available for 96,053 units assuming the modernization program is approved. Reservations have been approved for 96,860 units and applications are pending for 61,494 units more.

\*Potential "deadwood"--20,399 units under reservations a year or more since last action; 22,933 units under Annual Contributions Contract for two or more years since last action.

\*If all such units were terminated, the probable economic loss to the Department would be approximately \$3 million for the units under reservations and \$19 million for the units under Annual Contributions Contract.

\*Termination of this number of units would permit about 5 months of continued activity by the Department at present approval rates.

Recommendations

The Task Force recommends:

1. That, to cope with the present excess demand for funds, project applications should be received but not processed, and the applicants so notified.
2. That new priorities be established for processing applications, and applied to both pending applications and, to the extent possible, to reservations already approved but not under Annual Contributions Contract.
3. That Program Reservations which have shown no progress for more than a year, be terminated, unless there are compelling reasons and the project can show progress within 90 days, or can be converted to turnkey.

Regional Administrators should be requested to submit their recommendations with respect to each such project as soon as possible.

4. That inactive projects be terminated on a regular continuing basis, according to criteria similar to the above, in order to accelerate the rate of productivity and instill a high standard of performance.
5. That data-gathering and reporting systems be improved so they will be more useful as a management and policy-making tool.

THE FACTUAL SITUATION

A. The norms The median "pipeline" time taken by a project from start to finish is approximately 44 months.<sup>1/</sup>

The median time by stage is:

Program Reservation to Preliminary Loan..	2 months (estimated)
Preliminary Loan Contract to Annual Contributions Contract .....	10 months
Annual Contributions Contract to Construction start .....	20 months
Construction start to Date of Full Availability .....	12 months

The median time by Region is:

I .....	57 months
II .....	122 months
III .....	40 months
IV .....	106 months
V .....	37 months
VI .....	46 months

B. Size of present pipeline As of June 30, there were 228,761 units in the pipeline (reservation issued but not yet under construction).

The total breakdown is as follows:

Pending applications .....	61,494 units
Reservation to Annual Contributions Contract .....	96,860 units
Annual Contributions Contract to construction .....	131,901 units
Under construction .....	46,792 units

C. Amount of possible "deadwood" Following are the units currently in the pipeline which have shown no progress, for the time periods indicated, since the date of the last recorded action.

As of June 30, for the period between Program Reservation and Annual Contributions Contract:

<u>Time since last action</u>	<u>Number of units (cumulative)</u>
Three years or more	4,471
Two years or more	7,395
18 months or more	13,933
One year or more	20,399
6 months or more	42,394

As of June 30, for the period between Annual Contributions Contract and Construction start:

<u>Time since last action</u>	<u>Number of units (cumulative)</u>
Three years or more .....	15,931
Two years or more .....	22,933
18 months or more .....	27,947
One year or more .....	44,959
6 months or more .....	62,330

It should be noted that this tabulation shows only the elapsed time since the last action for which records are kept. It does not show the total elapsed time of the units from either the date of the original reservation or Annual Contributions Contract. For example, a project which received an Annual

Contributions Contract 10 years ago but purchased the land 5 months ago would not appear in the tabulation above. Thus the full dimensions of the iceberg are not presently known.

D. Application demand vs. available funds As of June 30, units in program reservations not under Annual Contributions Contract were 96,860 units. Applications for an additional 61,494 units were pending.

As of June 30, HAA's commitment balance for Annual Contributions Contracts was \$108,850,000. If the proposed allocation of \$20 million for modernization is approved, this would leave a balance of \$88,850,000--or enough to put only 96,053 other units under Annual Contributions Contract.<sup>27</sup>

Thus, the number of approved reservations already exceeds funds available for new Annual Contributions Contracts, and an additional 61,494 applications are pending. Even assuming a substantial attrition rate (which will probably be smaller than might be expected, because of the emphasis on production and turnkey), it would appear essential (1) that HAA stop processing new applications temporarily, (2) that it seeks to retrieve as many inactive projects as possible from the pipeline, and (3) that it apply a new system of priorities to all pending applications and, to the extent possible, reservations already approved but not under Annual Contributions Contract.

E. Program trends in recent years A number of shifts of program emphasis have taken place in recent years--toward smaller sized projects, toward greater participation by smaller towns, toward more units for the elderly, and toward single-project LHA's.

1. Project size In 1959 the number of projects completed with less than 50 units was 778. By 1963 this figure had risen 1,191. The median size of all projects completed dropped from 63 units to 58 in the same period.
2. Small town participation In 1961 reservations were granted to 724 towns under 5,000 population for a total of 25,590 units. In 1966 the figures rose to 1,526 towns and 69,667 units.
3. Units for elderly As of June 30, 1961 reservations had been granted to 287 communities for 34,299 units for the elderly. As of June 30, 1967, the figures rose to 1,912 communities and 190,271 units. In 1961 units for the elderly constituted 5.3 percent of the total, as compared to 20.5 percent of the total in 1967.

4. Single-project LHA's The number of LHA's with one project rose from 398 in 1961 to 736 in 1966.
5. Program mix As of June 30, activity among the different HAA programs (i.e. in the pipeline, including pending applications, but not yet under management) was as follows:

	<u>Number of Units in Pipeline (including applications)</u>
Conventional .....	272,564
Turnkey .....	26,513
Leasing ... ..	26,292
Acquisition with and.....	
without rehabilitation .....	11,678

The impact of the program trends described above is impossible to quantify. However, several generalizations can be made. The trends toward smaller project sizes, greater small town participation, and diversification of program mix have all affected staffing. Under present procedures it takes perhaps somewhat less time and manpower to process small-unit projects than large-unit ones. However, greater participation by small communities has necessitated substantially greater amounts of Regional Office time for education, technical assistance, and general "handholding." Involvement of staff in new programs has necessitated both internal education and greater external communication to LHA's and interested members of the public.

In contrast, the trend toward more elderly units has materially eased the problems of development cost ceilings, site selection, and general political acceptance.

CAUSES OF PIPELINE DELAY

A Central Office analysis of the units listed as "Not Scheduled" on the program control chart indicates there were 30,650 such units in all Regions as of April 30, 1967. Of these:

- 12,658 units were categorized as subject to LHA's or local delay.
- 4,520 units were subject to site selection or acquisition difficulties.
- 4,172 units were awaiting action on sites in renewal projects.
- 1,862 units were bids over estimate.

A spot review of remarks contained on the control charts appear to indicate that the following factors are among the major causes of delay: (1) excessive cost, (2) site disputes, (3) delay on renewal sites, (4) earmarking of units for relocation resource, (5) Workable Program or local agreement difficulties, (6) litigation, (7) rebidding required, (8) revisions of plans, and (9) lack of local interest.

#### IMPLICATIONS OF TERMINATING RESERVATIONS OR ACC'S

A number of implications--legal, economic, and political--are involved in any effort to eliminate "deadwood" from the pipeline.

Legal In general, HAA may terminate a contract by notice on any project which has not been permanently financed if there has been a "substantial default" or a "substantial breach" of the contract.

Section 507 (5) defines a substantial breach as a failure to "prosecute diligently" the development of the project. However, the term, diligent prosecution is not defined.

Since June 1963, the Annual Contributions Contracts have provided for the insertion of a date for the start of construction, which thus provides a basis for action.

In most contracts, but not all, contracts may not be terminated for lack of diligent prosecution unless the failure has not been remedied within three months after notification to the LHA's.

Economic While there appear to be no particularly severe legal impediments to termination of an inactive contract, there may be considerable difficulty in recovering funds advanced for the cancelled project either (a) because the LHA's may argue that the delay was beyond its control or HAA's fault, or (b) the LHA's may have no reserves from which to repay the funds advanced.

What are the possible economic losses?

If it were decided to terminate all program reservations which have had no action for more than a year and which are not under Annual Contributions Contract--20,399 units as of June 30--the theoretical maximum loss (assuming 90 percent of the units have preliminary loans at an average of \$140 per unit) would be \$2,855,860. The actual loss would probably be less, depending on how much had been paid out.

If it were decided to terminate the 22,933 units under Annual Contributions Contract but not under construction which have shown no action for two or more years, the possible loss would be as follows under the indicated assumptions:

\$ 2,201,568	salaries & overhead @ \$4 per unit per month
\$10,500,000	site acquisition, assuming 7,000 units had site @ \$3,000 per unit, with a 50 percent recoup of value
\$ 6,300,000	architectural and engineering, assuming a cost of \$500 for 7,000 units, and \$200 for 14,000 units.
<hr/>	
\$19,001,568	total

#### RECOMMENDATIONS ON TERMINATING EXISTING PROJECTS

The Task Force recommends that the Department take definite action to eliminate the "deadwood" from the program reservation part of the pipeline, for two reasons:

1. To permit continued activity in accepting and processing new applications, thus avoiding to the maximum extent possible a slump in the entire organizational machinery.
2. To make clear that the public housing program is "playing in a new ball game," that a business-as-usual approach will no longer be acceptable, and that HAA is determined to expedite its part of the process and expects the same from the local communities.

Rationale for action It is recommended that terminations be based on age since last action, rather than on a combination of age and other substantive criteria, such as whether they are family or elderly units or part of the renewal programs meeting the new Departmental goals.

In some cases, the data are not available and, in any event, there are so many variables and special circumstances that the actual termination of any specific project should be made only after review and comment by the Regional Office concerned. (A proposed memo is attached.)

It is further recommended that special attention be given to eliminating inactive projects in Regions II and IV, which have the abnormally greater median pipeline aging of 122 and 106 months respectively.

In general, it is recommended that effort be concentrated on eliminating inactive program reservations rather than on Annual Contributions Contracts, which are likely to be more difficult and more expensive to cancel and which might cause adverse reactions in the financial markets.

It should be noted that the termination of Annual Contributions Contracts, even though they may have shown no progress for long periods of time, poses problems since the Annual Contributions Contract is security for temporary notes outstanding in the hands of the public. However, every tactic short of termination should be employed to compel the LHA's to live up to their contracts commitments. In aggravated cases, it may be desirable to terminate the Annual Contributions Contracts, even at the risk of having the Federal government pay off the noteholders with the consequent damage to the reputation of the program.

The Task Force believes that the criteria for setting a cut-off date on program reservations should be as close as possible to the median period--12 months. If Annual Contributions Contracts are to be terminated, the cut-off date should provide a greater cushion. On that basis the following criteria are recommended:

Maximum Recovery potential

*For Program Reservations: 12 months	20,399 units
*For Annual Contributions 2 years	22,933 units

Assuming that, after consultation with the Regional Offices, approximately one-half is actually cancelled in each category, this would provide about 2-3 months of additional activity at present processing rates. (In fiscal 1967, program reservations were approved at a rate of about 8,000 units a month and Annual Contributions Contracts at a rate of 5,300 a month.)

Finally, the Task Force believes that culling out the "deadwood" should be done on a regular continuing basis, rather than as a one-shot effort, so as to instill a degree of pressure and standard of performance upon LHA's.

A series of "benchmarks" or indices of progress should be developed, and all projects should be reviewed quarterly to determine whether or not they are keeping pace with the desired time schedule. This procedure could be of significant help in shortening the pipeline time.

#### PRIORITIES FOR NEW APPLICATIONS

The need for the establishment of priorities for processing reservations now pending or approved is particularly urgent.

There are Annual Contributions Contract funds for only 96,053 units. There are 96,860 approved reservations and 61,494 more pending.

The Task Force also believes that, as a matter of sound policy, all new applications should be evaluated against established priorities even when new authorizations are provided by Congress. In other words, processing should not revert to first-come-first-served just because new funds become available and the supply temporarily exceeds the demand.

In establishing criteria, "need" is clearly a major factor. However, every effort should be made to evaluate pending applications on the basis of relative need among communities, rather than on some self-contained definition of need within the particular locality, as has been the practice in the past.

The objective should be to try to focus program resources in relation to the urban problems and tensions that have become this nation's number one domestic challenge, rather than to dissipate funds indiscriminately.

This does not mean that applications should be held up and then judged on a competitive basis. It means that certain indices should be developed to define a minimum threshold of need, against which applications could be weighed as they come in.

Some possible criteria against which relative "need" might be judged are: (1) number of low-income people within the community, (2) unemployment rates, (3) ratio of substandard and dilapidated houses to population, (4) ratio of existing public housing units to low-income population within the community, and (5) crime rates.

It is recommended, therefore, with respect to all pending and new applications and to the extent possible, to program reservations issued but not under Annual Contributions Contract, that

the Regional Administrators be instructed to give priority to projects which:

1. Demonstrate need in relation to the criteria above.
2. Can be completed rapidly (for such reasons as site availability, turnkey developer, proven ability of LHA, etc.) .
3. Provide relocation for urban renewal.
4. Serve Model City programs.
5. Provide family units.
6. Contain satisfactory evidence of participation by appropriate state and local agencies in the planning and provision of a well-rounded social service program.
7. Applications from small communities, to be developed and managed on a consolidated basis.

#### RECOMMENDATIONS FOR FUTURE REPORTING AND DATA-GATHERING

A number of steps should be taken to make available pipeline information more useful as a management and policy-making tool:

1. Information as presented in this report should be prepared on a regular, continuing basis.
2. All tables, graphs, statistical reports should have appended a brief narrative description of facts and trends that may be potentially significant for policy-making and management purposes, where the significance is not readily apparent. In other words, a "little red flag" notation.
3. A special analysis should be made, from time to time, of the total age of projects in the pipeline. At present, it is possible to determine only the length of time of project since a last action.
4. A new and more detailed series of "benchmarks" or indices of progress should be developed, with accompanying median time schedules, preferably based on turnkey experience, and all projects failing to meet the desired time schedules should be screened out for special attention. At present,

the benchmarks on which "actions" are tabulated seem insufficient in the ACC-to-construction start period.

5. Tabulations should be made of the number of projects which meet the various priority criteria selected.
6. A more refined breakdown should be made of the various causes of project delay, and standardized reporting of the criteria selected should be instituted, by sending S-10 and S-11 listings of programs delayed for more than a certain time, requesting Regional Offices to complete the listing by indicating specified causes of delay for each program.
7. Median project times for all stages of the pipeline (Program Reservations to Annual Contributions Contract, Annual Contributions Contract to construction, construction to date of full availability) should be provided on a regular basis. At present, the latest figures for all except the Annual Contributions Contract to construction period date back to 1962-64.

#### FOOTNOTES

1/ The present median pipeline time may possibly be longer than 44 months. The time is, in part, based on a survey of 745 projects between 1962-64. Only the 20 months median period from Annual Contributions Contract to construction is based on 1967 figures.

2/ The total of 96,053 units is derived from an assumed average Total Development Cost of \$18,500 per unit and an Annual Contract rate of 5 percent, giving \$925 per unit per year for annual contracts. The \$18,500 Total Development Cost is higher than the present average of approximately \$16,000, but is used by Budget as a basis for projection of future costs.

If other TDC's are assumed, the number of units which could be put under Annual Contributions Contract is as follows:

\*At \$17,000 TDC 104,528 units (assuming \$20 million modernization)

\*At \$16,000 TDC 111,062 units (assuming \$20 million modernization)

ATTACHMENT NO. 1

MEMORANDUM TO ALL REGIONAL ADMINISTRATORS

The pressing need of communities throughout the nation, for low-rent housing and the need to make most effective use of existing program resources, makes it necessary to take steps to terminate inactive projects showing no sign of progress and to establish priorities for processing new applications and reservations already approved but not yet under an Annual Contributions Contract.

Terminating inactive projects. At the present time, reservations now pending and already approved greatly exceed present authorization to issue Annual Contributions Contracts. Therefore, it is urgent that every effort be made to recover inactive units in the pipeline so that commitments may be made to communities with both the need and the ability to make rapid and effective use of available financial assistance.

Henceforth, as a matter of general policy, if a project under Program Reservation for a year or more has shown no progress, consideration will be given to terminating such projects unless there are valid extenuating circumstances or other compelling reasons and unless such projects will move in 90 days.

By \_\_\_\_\_, I would like to have your recommendations and explanatory comments with respect to each project in your region which has not shown the progress indicated above which you believe should not be terminated.

Establishment of priorities. Effective immediately, all pending and new applications, and to the maximum extent feasible, all reservations approved but not under Annual Contributions Contract, should be reviewed and given processing priority according to the following criteria:

1. Relative need among applicant communities, in terms of such factors as number of low-income persons in the community, ratio of substandard and dilapidated dwelling units to population, ratio of presently available standard low-rent dwellings to low-income population, unemployment rates, and similar indices of need.

2. Capability of rapid completion, because of factors such as site availability, participation of capable turnkey developers, and LHA's with proven ability.
3. Units serving as relocation resource for urban renewal projects.
4. Units serving approved Model City program, when applicable.
5. Unit designed for family occupancy.
6. Contain satisfactory evidence of participation by appropriate state and local agencies in the planning and provision of a well-rounded social service program.
7. Applications from small communities. to be developed and managed on a consolidated basis.

DETAILED RECOMMENDATIONS ON REDUCING PROCESSING TIME  
AND INCREASING THE VOLUME OF LOW-INCOME HOUSING

This Exhibit discusses in detail the recommendations of Chapter I, on increasing production.

The following subjects are covered:

- \*The Total Development Cost problem
- \*Revision of application procedures to reduce processing time
- \*Development of design guidelines
- \*Reararticulation of site selection policy
- \*Acceleration of the leased housing program

In addition, this Exhibit discusses three other proposals not covered elsewhere in the report:

- \*The inclusion of a low-income housing element in the Section 701 planning assistance program
- \*A search for suitable sites in existing renewal areas
- \*Exploration of ways to reduce housing costs

The Total Development Cost problem

In large measure the failure to build dwelling units for large families in high cost areas has resulted from the limitations of Total Development Cost. To overcome these limits, LHA's have combined elderly and small-family units in projects, avoided sites where demolition and relocation are necessary, and skimmed on the provision of non-dwelling facilities.

To overcome these problems, the Task Force recommends that:

- \*The present practice of setting one ceiling for the entire development cost be dropped. Major cost components--land acquisition, site improvements, and relocation costs--should be separately identified. Unit cost ceilings should be established on the basis of comparable costs on a square foot or bedroom basis within a particular market area.

\*HAA undertake a study and make recommendations on appropriate cost ceilings that should apply to the elements necessary for the production of low-income housing. Such ceilings should be related to actual market costs in various parts of the nation and should reflect periodic changes.

Sound cost limits must be related to policies on dwelling density (on a bedroom basis), construction standards including room sizes, and nondwelling facilities. Therefore, the relevant standards now applied to development practices should be reviewed concurrently with cost limits.

The question of making general cost ceilings public is a difficult one, because of the tendency of costs to rise rapidly to their ceiling. However, it is essential that every LHA be given a "ballpark" ceiling for the particular project proposed, based on the actual design features of its project and the construction costs in that locality.

#### Revision of application procedures

It is essential that processing procedures be streamlined.

The following is a more detailed explanation of the recommendations highlighted in the Report:

The Task Force recommends that:

- \*Revision of requirements for the application for a low-rent housing program reservation, to include evidence of the relation of local HAA low-rent housing programs, to other local planning efforts and programs for low and moderate-income housing and an indication from the locality showing those portions of the community desirable for low-cost housing.
- \*Preliminary loans be increased to cover costs of site borings, site surveys, schematic plans, outline specifications, appraisals and site options to facilitate action.
- \*Central Office re-review of the local need for low-rent housing at program reservation stage be eliminated.
- \*Firm site approval decisions be reached at the earliest possible stage, based on prior community approval of areas

for low-rent housing, investigation of soil and subsurface conditions, an acceptable cost determined by appraisals and cost criteria, and that the architect be allowed to proceed with schematic drawings.

\*The Development Program be greatly simplified (re-entitled "Project Program") and limited to information on the specific proposed construction--the scope of the proposed construction, dwelling and non-dwelling, the estimated costs, the number and type of units, supported by sketch plans in the form of schematics, and the site development plans, also supported by schematics and related to soil and subsurface conditions.

Since the applicant would be given a clear indication of cost limits, it would be the responsibility of the architect (and builder in the case of turnkey projects) to adhere to these limits. Since environmental questions have been dealt with in advance of the Project Program stage, there would be no reason to re-review them at this time.

\*Central Office reviews of the Project Program be eliminated. The only submission to HAA should be a summary of the number, type, estimated cost of dwellings; location size and cost of sites; the proposed non-dwelling construction; and relocation plan.

There will be some exceptions when Central Office advice and guidance is required (e.g., where project proposals have unusual design features, where arbitration between the LHA and the Regional Office is required, or where costs exceed allowable limits).

\*Regional Office review of working drawings and specifications be limited to a quick review to be sure that changes recommended at the schematic phase have been followed and that plans and specifications follow national guidelines.

\*Production time schedules be published to assure that production goals are met. Architects should know when they are expected to complete drawings for both schematic and final review and they should be held to these schedules. Target dates have recently been established for turnkey housing. Similar flow charts should be prepared for the conventional program, for rehabilitation, and for leasing projects.

## Development of Design Guidelines

The Task Force recommends that:

\*HAA begin work on the preparation of design guidelines and performance specifications, related to concurrent determination of construction cost limits, for dwelling and non-dwelling construction.

Creative designers are seldom inhibited by design guidelines and performance specifications, but less-gifted individuals are helped by them, assuming that talented professionals prepare the guidelines and specifications, that flexibility is built into the process, and that there is a system for continuous study and revision.

\*Design guidelines allow standard plans for dwelling units.

\*HAA exercise design leadership aimed at: overcoming the restrictive design language presently contained in the Housing Act; stimulating the interest and participation of designers, builders, and the housing industry at large; stimulating national and local acceptance of systems building to increase production and lower costs.

## Rearticulation of site selection policy

The Task Force believes that the failure of the low-rent housing program in recent years to produce greater mixed racial occupancy is cause for concern. The location of a public housing project determines to some extent whether the project may be expected to attract mixed racial occupancy. Moreover, we believe that a site selection policy calculated to produce equal opportunity on the part of persons of all races to obtain public housing is essential to comply with the letter and spirit of Title VI of the Civil Rights Act of 1964.

Nonetheless we are firmly convinced of the necessity for continued clearance of slum areas and the construction of low-rent public housing to replace demolished structures. We also believe that it is in the public interest to program the construction of such housing in slum areas in ever increasing volume, provided efforts are made to revitalize the ghetto and provide necessary community services.

Many of the persons consulted by the Task Force expressed concern that the present site selection policy will preclude construction of public housing in substantial volume in areas of racial concentration. It was also suggested that on the surface this policy seems inconsistent with the current emphasis in both the Model Cities and urban renewal programs to provide low and moderate-income housing in project areas.

Accordingly, the Task Force recommends that the site selection policy should be rearticulated to make it clear that public housing may be programmed in areas of racial concentration, concurrently with undertakings to promote the dispersion of minority group members from those areas of racial concentration.

#### Acceleration of leased housing program

The Congress originally authorized funds for a projected 40,000 units of leased housing over a 4-year period. As of August 25, 22,899 units have been placed under Annual Contributions Contract, with applications for 10,933 more pending. Only 5,075 units have been occupied.

In view of the leased housing program's potential for getting people under roof quickly, for housing large families without being severely impeded by the Total Development Cost constraint, and for advancing the goal of non-segregated housing opportunities, immediate efforts should be made to determine present program bottlenecks and to launch an intensive effort to accelerate its progress.

The Task Force believes consideration should be given to the following steps:

- \*Examine private owner motivations and needs, especially the ratio of required rehabilitation expenditures in relation to leasing periods and rental return.
- \*Strongly encourage and prod LHA's to take broader initiatives in seeking out potential lessors, rather than relying primarily or solely on available vacancy lists supplied by local real estate agents. Efforts should be made to directly enlist the interest and participation of large property owners, churches, nonprofit organizations and other institutions.
- \*Reallocate HAA-HAO staff resources to insure that greater leadership and technical assistance can be provided to communities interested in the program.

The Task Force also believes that an important stimulant to both the leasing program and housing construction generally would flow from authorization to lease units to be constructed as well as to lease already existing private housing.

### Inclusion of low-income housing element in Section 701 planning

The Task Force believes that the responsibility to meet the national goal of a decent home in a suitable living environment is one that rests with each local government and with the entire Department.

To this end we recommend that HUD policies for the provision of Federal assistance for urban and metropolitan planning require that all Section 701 work include development of policies, plans and programs to ameliorate the housing, transportation and recreation needs of low-income and minority groups within the planning area.

There should also be periodic Departmental evaluation of planning work programs conducted with Federal assistance to assure that these matters are being addressed in the planning process.

### Search for suitable sites in existing renewal projects

The Task Force believes that there may exist vacant land in existing renewal projects that could be utilized for low-rent public housing units. In light of the critical dimensions of the site problem for low-rent housing construction in our major metropolitan areas, we recommend an in-depth project-by-project search for suitable sites and an exploration with the localities involved of the obstacles to their use for the construction of low-income housing.

### Exploration of ways to reduce housing costs

The Task Force recommends a study either independently by HAA's proposed Research and Technology Branch, the Office of Urban Technology and Research and/or outside consultants to determine the feasibility of utilizing principles of self-help in the construction or rehabilitation of housing and of accepting building components and units, such as mobile homes, whose life expectancy is less than the 40-year amortization period. If expanded programs of self-help housing are determined feasible, HAA should seek to initiate pilot undertaking in connection with job training programs.

OPTIONAL FORM NO. 10  
MAY 1962 EDITION  
GSA FPMR (41 CFR) 101-11.6

UNITED STATES GOVERNMENT

# Memorandum

REVISION

TO : H. Ralph Taylor, Assistant Secretary for Demonstrations and Intergovernmental Relations      DATE: August 8, 1967

FROM : Thomas W. Fletcher, Housing Assistance Administration

SUBJECT: Program for Upgrading Low-Rent Housing Projects

We are in complete agreement with the Secretary's memorandum of July 31, 1967, especially the statement regarding the inseparability of improvement of physical plants and management at the same time. There is an urgent necessity to review the low-rent housing program with the purpose that these projects may serve as a vehicle for making real the hopes and aspirations of the residents. Further, there is a need to show the surrounding area that when government works with people the quality of life can be raised. Then, the projects will work as a positive force in the community.

There are four major prongs to any attack on the despair and frustration so characteristic of deprived tenants in housing projects:

1. To develop the resources and to use every possible means at hand that will motivate families and their individual members to make use of the many opportunities available for education, employment, and general advancement.
2. To develop and nurture vehicles that give the families an opportunity to participate in the vital decisions of their home and neighborhood.
3. To stress and implement the modernization and rehabilitation of the neighborhood as well as the home. "Housing" implies far more than just provision for safe and sanitary physical shelter. It is coordinated physical and social planning that has the potential of strongly affecting the environment, and in turn, the shaping of individual and group behavior.
4. And, above all, there is a need for action that gives immediate satisfaction as well as a need for careful planning and development of long term projects.



There are five areas in which we believe immediate and longer term programs can be developed which will achieve these objectives:

1. Provision and expanded use of community facilities;
2. Modernization and betterment of existing low-rent housing projects;
3. Securing the involvement of tenant families in the plans and programs for the improvement of the projects and the neighborhood in which they live;
4. Working with LHA's to support and intensify their efforts to assist low-income families to maximize their potentials for economic advancement; and
5. The provision of increased employment opportunities for low-income families residing in the projects.

The specific development of these action programs will be spelled out below.

#### A. ACTION PROGRAMS

##### I. Expanded Use of Community Facilities

While most local housing authorities have community space, such facilities vary greatly with respect to space and the number and quality of programs and the intensity of their use. To make such facilities more significant in the improvement of family life and neighborhoods the following actions should be instituted.

1. Additional community facilities should be provided if needed by reopening development funds:
  - (a) where under existing administrative regulation, local housing authorities have not used the maximum amount of space allowances available, and
  - (b) where housing units are now being used for community service, and dwelling units can be returned to housing use by providing additional permanent space.
2. Make more effective use of existing facilities. This will be accomplished by:
  - (a) extending the hours of use into the evening and over the weekend either by placing more agency resources

into the program for the facility, or providing on-site additional staff (hopefully from among project residents).

- (b) for temporary space requirements, make use of existing vacant housing units until more permanent arrangements for programs can be achieved.
3. Obtain an increase in the amount of community facilities available in the neighborhood by:
- (a) focusing the attention of other governmental agencies and programs on the need of the residents and the community.
  - (b) securing access to available space not now being used for program purposes such as public school and school playgrounds, churches, and vacant buildings.
4. In cooperation with appropriate Federal, State and local public and private agencies, increase the number of programs with special emphasis on those leading to economic advancement.

To accomplish the above purposes, funds are available as follows:

- 1. HAA can, as stated above, reopen development budget, and by increasing total development costs, provide new facilities for existing projects.
- 2. Local Housing authorities' operating budget increases can be authorized to the extent that residual receipts are available to the local housing authority.
- 3. Other governmental funds, i.e., HEW, OEO, HUD constituents, State and local public and private resources.

## II. Modernization

There is a great need to modernize many existing low-rent public housing projects. This modernization consists of two parts:

- (1) The restoration of the effective functioning of existing plant and equipment which is worn out or has become obsolete, and
- (2) The addition of new features and amenities to existing projects.

It is estimated that \$350 million dollars could profitably be spent in such program in the next few years. A number of requests from local housing authorities for funds for modernization have already

been submitted and have been held in abeyance because of the absence of Congressional approval of the use of annual contribution funds for modernization rather than new construction.

We would recommend that the Secretary authorize the Housing Assistance Administration to make \$28 million dollars of annual contribution funds available for modernization. This will provide \$350 million for capital improvements. It is estimated that the use of such an amount of annual contribution funds will reduce the amount of new units that might be provided under the Housing Act of 1955 by approximately 35,000. HAA's most recent estimate of the amount of new dwelling units that will be produced under the Act is about 211,000 units. This other use of annual contribution funds would reduce our expected increase in the inventory of new low-rent housing dwelling units to 176,000 as contrasted to the original estimate of 240,000. Many items of modernization work can be made visible very quickly and the restoration of the quality of the low-rent program is as important, in my judgment, as is the increase in inventory. A preliminary analysis of HAA workload indicates that this use of annual contribution funds will have no effect on the 115,000 dwelling units scheduled for completion in fiscal years 1968 and 1969. However, it will have an immediate effect of stopping the placement of new units into the pipeline. If this is not to halt the low-rent housing program, it is imperative that additional program authorization be requested of the Congress as soon as possible.

Aside from modernization, immediate steps will be taken to direct local housing authorities' attention to improvement in the maintenance of projects. Much can be done by deployment of existing HAA staff to improve operating practices by eliminating faults in the maintenance operation that cause or bring about unhealthful and unsanitary conditions or are justifiable sources of irritation to tenants.

For example:

- Delays in repairs and maintenance requested by tenants, such as for plumbing, refrigerator repairs, replacement of broken windows.
- Presence of rats and vermin
- Physical conditions such as dark, dirty stairways, and corridors.
- Rundown equipment, such as kitchen ranges, inadequate refrigerators.
- Worn and torn floor coverings, lack of or torn window screens.
- lack of play areas, broken sidewalks, unprotected potential hazard areas.

--inadequate, infrequent, dangerous and inconvenient means for disposing of garbage and trash.

3. To utilize all available resources for improving the projects, such as open space beautification, neighborhood facilities, and low-rent housing demonstration grants.

### III. Tenant Involvement

It is essential, if a low-income family is to come to care for his house and the condition and quality of the project, that it has a voice in its operation. Similarly, the best method of motivating a family or an individual to use the resources intended to help him get an education, use health services and job training, is to let him take part in deciding what programs are to be brought to the project and how they can be utilized most effectively.

HAA will therefore urge IHA's to multiply and expand the use of tenant organizations, committees and councils not only in an advisory capacity but, progressively as partners in making decisions affecting project operation.

Emphasis will be placed on the formation of tenant councils which will have a role officially recognized by management, first, in the solving of mutual problems such as children playing noisily in corridors. The abuse of elevators, the scarcity of playground equipment, the color of paint, their right to paint or fix up their own dwellings; second, in decisions affecting improvements and betterments scheduled for the modernization of the projects; third, in the expansion of community facilities and additional programs for these facilities.

This participation in planning and decision making is necessary as a matter of protection of the investment. As tenants participate they will have a reason for protecting the improvements and making their children protect them too. In addition, if they help set up the service program, they will use it.

### IV. Management

To improve project management, local housing authorities will be encouraged to modify and change existing policies and practices so that they will contribute positively to the growth of project residents. This involves giving tenants a means for self-expression and a chance to develop dignity as responsible citizens by encouraging their participation in solving problems and in decision-making that directly affects them. To this end they will be encouraged to:

1. Update their rental and occupancy policies and practices and to adopt new regulations which effectively help families reach economic independence such as the elimination of interim

income examinations, liberalization of definition of net income in order not to inhibit secondary wage earners from seeking employment, elimination of retroactive rent charges, and the simplification of rent schedules.

2. The review and elimination of policies which reflect out-moded attitudes towards the problems of disadvantaged families. For example: eliminate charges for damages not clearly due to the fault of the tenant. Modify regulations which preclude the tenant from having freedom in the use of dwelling units and associated grounds. Discuss with tenants the reasons for invoking punitive regulations or the enforcement of policies which irritate large groups of the tenant body.

#### V. Employment

A primary objective is to make every effort to enable tenants to increase their earnings and thereby achieve economic independence. The following actions are proposed:

1. To encourage local authorities to utilize tenants as employees, both in the management and rehabilitation of properties. This will use project operations as a means of providing job training and increasing the earnings of families, thus retaining earning families as tenants.

There are three possibilities: permanent positions as staff vacancies occur without replacing existing personnel (custodians, receptionists and clerical staff, and, with appropriate training, management aides, tenant selection or income check personnel); force-account labor for use in rehabilitation or special maintenance programs; sub-professional aides to service programs such as the well-baby clinic, Head Start, Day Care, recreation, etc.

While special emphasis is given to the employment of tenants, if none are available, LHA's should seek employees from among the unemployed in the neighborhood, thus strengthening the role of the authority in the community.

2. To redirect the community service programs to give special emphasis on securing neighborhood based employment centers where an under-employed or unemployed tenant can receive such assistance as he needs to prepare for a job and where he can be placed in a job.

3. Increase the number of day care centers so as to release mothers for employment and to give employment to mothers serving the day care centers.
4. To eliminate tenant fears that becoming gainfully employed will lead to the loss of his home, we will encourage local authorities to make maximum use of provisions of the Act relating to the eviction of over-income families. A clear-cut statement is being included in the Low-Rent Management Manual to the effect that it is inconsistent with the purposes of the U.S. Housing Act of 1937 to require a family to move from public housing on grounds of increased income unless the supply of decent housing in the community is sufficient to enable it to obtain suitable housing it can afford.
5. As an inducement to tenants to take employment with the authority, permit them to remain in residence regardless of income.

#### B. IMPLEMENTATION

To recapitulate we have proposed five areas of program activity.

1. The provision and extended use of community facilities;
2. The modernization and betterment of existing low-rent housing projects;
3. Securing the involvement of the tenant families in the plans and programs for the improvement of the projects and the neighborhood in which they live;
4. Working with LHA's to support and intensify their efforts to assist low-income families to maximize their potentials for economic advancement; and
5. The provision of increased employment opportunities for low-income families residing in the projects.

In each of these areas there are immediate and longer term program activities to be instituted as follows:

#### I. Community Facilities

##### (a) Immediate action

1. Ask selected local housing authorities to identify physical needs;

2. Deploy HAA staff to help local housing authorities prepare new construction proposals; including air-conditioning of existing community facilities where climate requires.
3. Deploy HAA staff to assist local housing authorities in the mobilization of additional local resources; both physical and program.

(b) Longer Term

1. Secure Administration support for the proposed legislation to be introduced by Congressmen Moorhead and St. Germain to provide funds and additional authority for the provision of social services and recreational facilities, respectively.
2. The organization of an interdepartmental task force to deal with the problems of improving the coordination and delivery of services at the local level. Primary emphasis must be on employment. The experience of the HHFA-HEW Task Force demonstrated clearly the benefits to be derived from such a joint effort, but the experience showed equally clearly that the Department of Labor and OEO must be included as members of the task force. Furthermore, if the task force is to be successful it must be financed and staffed.

II. Modernization

(a) Immediate action

1. Deploy regional maintenance engineering staff to review requests for improvements, identifying those that can be immediately undertaken within existing regulations;
2. Request local housing authorities to develop needed modernization programs; and ..
3. Request HAA maintenance engineers to determine existing inadequate maintenance practices and ask local housing authorities to initiate immediate visible corrections.
4. Identify approved operating budgets and review reserve requirements to make a maximum of funds available for immediate use.

(b) Longer term

1. Request the Congress to increase the authorization for modernization from \$1 to \$28 million dollars.
2. Request new ~~legislation~~ for increased program authorization.

### III. Involvement

#### (a) Immediate action

1. Issue guidelines to local housing authorities showing the many areas in which decisions can be shared without affecting local housing authority responsibility or costs, i.e., color of paint, laundry room scheduling, tenant organization procedures.
2. Incorporate into management review procedures the promotion of active tenant councils.

#### (b) Longer term

1. Assist LHA's to develop a closer link with neighborhood community agencies.
2. Request local housing authorities to secure consumer education and legal advice service for tenant groups where available locally.

### IV. Management

#### (a) Immediate action

1. Issue new guidelines for the Local Authority Management Handbook.
2. Instruct HAA management staff to undertake quickly directed special reviews of selected local housing authority practices to test compliance with new HUD social goals.
3. Establish workshop for selected local housing authority principal staff to discuss new HUD social goals and applicability to existing local housing authority policies and practices.

#### (b) Longer term

1. Establish special regional teams to conduct social management reviews of local housing authority operations to provide specific suggestions to local housing authorities for revisions of policy and practice to make local operations more effective in realizing HUD's social goals

V. Employment

(a) Immediate action

1. Issue new standards and guidelines concerning tenure of overincome families.
2. Request employment service offices to establish outreach stations in project neighborhoods.
3. Authorize local housing authorities to establish new positions for resident employment to the extent funds are available in existing annual contributions contracts.

(b) Longer range

1. Use of HUD's Convenor Power to establish employment centers.

We believe these actions will relieve tensions among low-income families and will further the Secretary's aims as set forth in his memorandum to you of July 31, 1967.

Deputy Assistant Secretary

COMPARISON OF RAA AND HAA PERSONNEL

(As of June 30, 1967)

Relative Distribution by Grade

<u>Grade</u>	<u>RAA</u>	<u>HAA</u>
GS- 2-5	19.8%	31.0%
GS- 6-10	23.2	23.3
GS-11-13	28.1	26.3
GS-14-15	24.8	17.7
GS-16	3.3	1.3
GS-17	0.8	0.4

Relative Distribution by Age

<u>Age</u>	<u>RAA</u>	<u>HAA</u>
Under 25	19.7%	10.2%
25 - 34	24.6	15.6
35 - 44	23.7	19.5
45 - 54	22.2	30.1
55 - 64	9.8	20.4
65 or more	-	4.2

Relative Distribution by Length of Federal Service

<u>Length of Service</u> <u>Years</u>	<u>RAA</u>	<u>HAA</u>
Under 5	35.2%	22.4%
5 - 14	29.6	21.9
15 - 24	26.2	31.5
25 - 34	9.0	23.3
35 or more	-	0.9

STATUTORY REQUIREMENTS FOR THE LOW-RENT  
PUBLIC HOUSING PROGRAM\*

- Sec. 2. (1) Low-rent housing for families of low income.
- (2) Families of the lowest income group. (single persons only in certain instances).
- (11) Assistance only through public housing agencies (local housing authorities).
- Sec. 6 (d) Contract of financial assistance must be approved by President (delegated to RHA Assistant Secretary).
- Sec. 10 (e) Community must have an approved Workable Program for Community Improvement.
- (h) Property of LHA must be tax exempt (local contribution may be made in lieu of exemptions).
- LHA must notify locality of payment in lieu of taxes.
- Sec. 15 (7) (a) Local governing body approval of applications and LHA demonstration of need.
- (b) Demonstration of 20% rental gap; cooperation agreement.
- Section. 23 Leasing not subject to Sec. 10(h); 15(7) (except local governing body approval of application of provisions of Sec. 23 to locality); or Workable Program requirements. 10(e).

\*As incorporated in the United States Housing Act of 1937, as Amended (Public Law 412, 75th Congress; 50 Stat.888; 42 U.S.C. 1401 et seq).

HUD-96 (7-66)

UNITED STATES GOVERNMENT

DEPARTMENT OF  
HOUSING AND URBAN DEVELOPMENT

# Memorandum

TO : Morton Leeds, Director,  
Plans, Programs, and Evaluation Staff

DATE: August 24, 1967

In reply refer to:

FROM : Arthur E. Rosfeld, Chairman, HAA Task Force

SUBJECT: Community Profile

There is a need to develop, on a short-term basis, for each of the major urban areas a useable and not overly detailed "community profile" which would provide a standard base for evaluating the possibilities of making substantially greater allocations of low-rent housing to such areas.

Some of the major criteria for which information would be needed are:

1. Need within the community and relative need among communities for low-rent housing.
2. Market for public housing and community capacity to absorb the proposed allocation.
3. Capability of the community to produce.
4. Degree of Departmental activity in the community.
5. Land and construction costs for comparative purposes.

Based on these broad objectives, it is hoped that you can determine what specific data would be relevant and possible to obtain. Where applicable, it would seem desirable to have data on a uniform basis for comparative purposes and broken down by family/elderly and by white/non-white.

Without attempting to evaluate the feasibility of collecting them, the following items are suggested as possible data which might be considered under each of the above criteria:

### Need for low-rent housing

1. Per cent of individuals and families with low income in relation to total area population.
2. Per cent of substandard units to total units.

3. Per cent of public housing units (in development and management) to both (a) number of substandard units and (b) to total individuals and families with low incomes.
4. Social unrest in community as indicated by delinquency and crime rates, unemployment rate, educational level, and health statistics at the infant mortality rate.
5. Estimated displacement rates and relocation needs.
6. Measures of local financial effort and need, as indicated by the tax rate, level of indebtedness, or other indices.

Market for public housing and community capacity to absorb

1. Economic market analysis information.
2. Vacancy and turnover rates in existing public housing units.
3. Probable labor availability based on total community construction activity.
4. Probable site availability--amount of vacant land zoned for multi-family units.
5. Record of past rate of public housing construction, average pipeline time.
6. Number of units existing, under development, and proposed--total and as a percentage of community housing stock.

Capability of community to produce

1. Past development record: median pipeline times of projects developed in recent years; status of present pipeline--time lapses between critical actions.
2. Availability of sites.
3. Restrictive state and local laws.
4. Status of program pre-requisites (Workable Program, planning)

Departmental activity in the community

1. A listing of HUD programs in the community--completed, in execution, and in planning.

2. More detail might be given other low and moderate income housing programs, as 221(d)3 BMIR and Rent Supplement (e.g. sponsor, number of units, rents).

Land and construction costs for comparative purposes

1. Data on average land costs per unit, under various zoned densities.
2. Building construction costs for differing types of construction, (high-rise, low-rise, row, etc.) on a square or cube foot basis.
3. Data on Total Development Costs of existing public housing or under development.

It would be helpful to have with the profile a large-scale map of the area which shows the location of the CBD, public housing projects, renewal projects, and 221(d)3 projects. It would also be helpful to have the poverty areas identified and, to the extent possible, the location of schools and other public facilities marked.



Chairman

DEPARTMENT OF HOUSING  
AND  
URBAN DEVELOPMENT

JAN 15 1980

LIBRARY  
WASHINGTON, D.C. 20410

728.1

: 336.18

H68ha

728.1 :336.18 H68ha

U.S. Housing Assistance Adminis-  
tration. HAA Task Force.  
HAA Task Force report ...

DATE

ISSUED TO

