

EQUAL OPPORTUNITY IN HOUSING: A MANUAL FOR CORPORATE EMPLOYERS

U.S.DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

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AND URBAN DEVELOPMENT

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IN HOUSING:
A Manual
for
Corporate Employers**



This publication was prepared by Westchester Residential Opportunities, Inc. under contract with the U.S. Department of Housing and Urban Development. The statements, findings, conclusions and recommendations are solely those of the contractor and do not necessarily reflect the views of the Department of Housing and Urban Development.



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I. INTRODUCTION

The immortal Joe Louis said of another situation, in another time: "You can run but you can't hide." So be it with the corporate community in relation to adequate and equal housing for minorities. Among the laws of the land are those which require equal employment opportunity for minorities. Corporations running to the outer areas of the city will not be able to hide from the full enforcement of the mandates of legislative and executive authority vested in agencies to monitor and enforce compliance.

They, therefore, have a vested interest in the drive to insure adequate housing for all Americans by helping to break the back of housing discrimination because of race, creed, color, sex, or national origin.

Equality in housing, jobs, and a chance for a better quality of life for every American are the keys to a tranquil community and stable profits. There is more to the minority revolution in this country than is highlighted through a television tube and the newspaper headlines at this juncture of our nation's history.

So-called *minority Americans* have made a major turn from the pursuit of issues to the pursuit of problems. This American has turned from a struggle of what he was to the more commanding thrust of what he hopes to become - from an emphasis on need to an emphasis on opportunity.

It would do corporations well to remember that the controversy about the nation's minorities seldom comes up in the market place. Here equality is a cost factor. What they buy greatly affects the gross yield of any corporation.

Since the subject of each American's share of democracy is more and more being mandated by law, it is essential that firms draw a sharp and vital distinction between their role in the pursuit of equal opportunity and the framework of their everyday living apart from the customers not wanted next door.

Actually there is an unseen and dynamic change taking place on all levels of the minority community. Corporations which have traditionally been rather static will also have to make a dramatic turnabout, and add a new dimension to traditional corporate programs to better the quality of life of all Americans.

This awareness must go beyond their traditional campaigns to market their goods and/or services. This book is designed to help corporations deal with one of the most pressing issues of the minority stride towards equality. The thirst, and thrust for freedom is Fair Housing.

A handwritten signature in black ink, appearing to read "Gloria E. A. Toote". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Gloria E. A. Toote
Assistant Secretary for Fair
Housing and Equal Opportunity

II. OBLIGATIONS OF FEDERAL CONTRACTORS TO GIVE HOUSING ASSISTANCE TO MINORITY EMPLOYEES

" . . . in accordance with obligations imposed under its contracts with the government of the United States of America, plaintiff CATERPILLAR TRACTOR CO. affirmatively recruits persons of the Negro race for employment in technical and professional capacities . . .

"[Because of defendant apartment house owner's refusal to rent to black management employee] CATERPILLAR TRACTOR CO. has suffered and will continue to suffer damages for the reason that such racial discrimination as heretofore alleged makes it more difficult for plaintiff CATERPILLAR TRACTOR CO. to recruit competent and skilled black employees. Such racial discrimination casts doubt upon the good faith of plaintiff CATERPILLAR TRACTOR CO.'s representations to [black employees that they would obtain suitable housing without discrimination]."

— *Caterpillar Tractor Co. v. Hansen (Complaint)*
U.S. District Court, So. Dist. Ill., 1971.

Pursuant to Executive Order 11246 (as amended) and its implementing regulations, corporations holding major Federal contracts have an obligation to affirmatively hire and promote minority group members and, where appropriate, to develop goals and timetables for that purpose which meet the approval of the Government. They have no obligation under the Order, however, to deal with minority housing problems, segregation and discrimination except to the extent that these factors have or are likely to have a negative impact on their equal employment opportunity progress.

The basic documents outlining the Government's requirements in the EEO field are Executive Order 11246 and the Department of Labor regulations known as Revised Order No. 4.¹ Section 60-2.23 of Revised Order No. 4 requires Federal contractors to make an "in-depth analysis" of a variety of factors, including housing availability. If the company finds that "lack of access to suitable housing inhibits recruitment efforts and employment of qualified minorities", then "special corrective action should be appropriate."

Original Order Number 4² required that corrective action might be appropriate only where inadequate housing opportunity inhibited minority employment in professional and management positions. Revised Order No.

4 extends this requirement to technicians, sales workers, office and clerical, skilled craftsmen and trainees—the full range of occupations covered by the Order.³

According to a spokesman in the Office of Federal Contract Compliance (OFCC), Department of Labor, which coordinates compliance activities of the Government, access to housing continues to remain a significant problem, with its importance increasing as more blacks reach manager/transferee status. It is felt at the Department of Labor that an employer cannot excuse a bad hiring and promotion record solely on the basis that discrimination exists in the housing market; this is not always outside the control of the employer and where feasible can and should be changed by affirmative employer actions.⁴

Revised Order No. 4 requires contractors to see if lack of access to housing is hurting minority employment efforts. The U.S. Civil Rights Commission has strongly urged OFCC to go one step further. Under the Commission proposal, each contractor, as part of compliance requirements, would have to demonstrate that housing within reasonable access is available on a non-discriminatory basis and available to meet all employee income ranges of current and potential employees.⁵

The outlook would thus seem to be for continuing government interest in the linkage between jobs and housing.

III. HOW CORPORATIONS HAVE AIDED MINORITY EMPLOYEES TO FIND HOUSING

A substantial number of major corporate employers have taken steps to assist minority employees locate decent housing, either on a "one-time" basis as the result of a complaint by a black employee, or as a formal program, ready for use as the need arises.

Corporations have contracted with non-profit open housing centers to relocate minority employees, or have contributed funds or services to these centers; have pressured landlords and real estate brokers to provide non-discriminatory service; have signed fair housing pledges; or have taken other action. These company initiatives will be discussed in turn.

A. Relocation of Minorities by Open Housing Centers

A number of corporations have developed relationships with fair housing centers under which minority employees are assisted to find housing.

Typically under these arrangements, the open housing centers advise minority employees of their rights under the law; help them determine whether they are financially able to buy a home, and in what price range; provide information on neighborhood characteristics; refer employees to landlords and real estate brokers, often providing escorts; provide legal anti-discrimination back-up where necessary; and arrange mortgage financing for homebuyers.

These services, if duplicated on an "in-house" basis, would be very costly. And, the specialized knowledge and techniques needed to adequately assist minorities in a basically hostile housing environment may not be worth developing in-house until the flow of minorities increases substantially.

With respect to transferred employees, the open housing centers are able to save the company dollars by speeding up the process of home-buying. Every week not spent in a motel, not eating meals and renting a car at company expense, and not house-hunting on company time constitutes a significant saving. The impact on employee morale that the company "cares" cannot be calculated in monetary terms, but is nonetheless real. Also, the company, as an aid in recruiting, can point out to potential employees the existence of its special housing program.

The company-open housing center arrangements take varying forms, based on company preference. Some are contracts providing for annual consultation/availability fees plus individual referral fees for each employee assisted by the center. There are also contracts or memoranda of under-

standing which contain an annual flat fee for all employees. Some agreements provide a flat fee for a stated number of employees; if the number of referrals during the year exceeds the maximum, then additional payments are made or the agreement is renegotiated for the following year. Finally, in some instances, the company merely makes a contribution to the open housing center based on past or prospective services to its employees.

The annual cost to companies of such arrangements varies from several hundred to several thousand dollars, depending on the movement of minorities into and within the companies, and on usage of the open housing center's services by on-board employees.

In the New York Metropolitan Area, the Open Housing Center of the New York Urban League provides housing services in New York City while the Urban League of Westchester County provides services in the northern suburbs.

Among the corporations which have relocation agreements with both these Urban Leagues are General Electric Company, American Standard Company, Continental Can Company, Consolidated Edison, and the accounting firms of Arthur Anderson & Company; Haskins & Sells; Lybrand, Ross Bros. & Montgomery; Price, Waterhouse & Company; and Arthur Young & Company. IBM Corporation has made contributions to both organizations based on services rendered.

The Open Housing Center has relationships also with General Motors Corporation, the American Stock Exchange, General Telephone and Electronics, Celanese Corporation, Equitable Life Assurance Society, Bankers Trust Company, Chemical Bank, and First National City Bank. The Westchester Urban League relocates minorities for General Foods Corporation, Bristol-Myers Company, Ciba-Geigy Corporation, The Nestle Company, Philip Morris, Standard Oil Company of New Jersey, Union Carbide Corporation and several other companies.

In Cincinnati, General Electric Company and Procter and Gamble Company have for about five years utilized Housing Opportunities Made Equal (HOME) as a relocation resource. Agreements provide for an annual retainer to cover a specified number of referrals. GE's corporate equal opportunity office reports that HOME "can use pressure to obtain housing because they are authorized to tell owners of large numbers of apartments for rent, that these companies sponsor fair housing. A legal fund has been established recently to bring suit against those realtors or owners who discriminate."⁶

In the midpeninsula suburbs below San Francisco, companies including Hewlett-Packard Company, Syntex Corporation, Alza Corporation and Varian Associates, have along with Stanford University and several cities

contracted for an Employer Subscription Service provided by Midpeninsula Citizens for Fair Housing (MCFH). MCFH services cost the subscribing employers from \$25 to \$100 per month.

In Denver, the Metro Housing Center has on a fee basis provided housing-related services to Western Electric Company (assisting minority employees with housing discrimination cases), United Bank of Denver and Martin Marietta Corporation, Denver Division (preparation of pamphlets on housing opportunities and conducting seminars on housing for employees), and Honeywell in Littleton, Colorado (finding homes close to plant for "hard-core unemployed" people being trained for electronics work).

In White Plains, N.Y., Westchester Residential Opportunities, Inc. (WRO) has entered into contracts with IBM Corporation, General Foods Corporation, New York Telephone Company and Consolidated Edison Company to relocate minority employees into homes and to consult on equal opportunity in housing matters. AT&T Long Lines has made a contribution to WRO in exchange for such services. WRO keeps the companies informed on new housing developments locally and nationally (relating to site selection problems, for example) discusses the housing situation with prospective new hires or transferees, and assists employees, black and white, transferring and on-board, to find homes. Employees are assisted to arrange mortgage financing, and WRO sometimes makes second mortgage loans from its own funds to homebuying employees. (A sample contract is appended as Exhibit A, page 29).

IBM has summed up its relationships with WRO and two local Urban Leagues as follows:

"They provide a comprehensive service, including financial counseling, housing selection, mortgage placement, assistance (where necessary) in investigating possible discrimination, and (where necessary) second mortgage programs. They also provide general consulting services to IBM on trends and developments in the local housing market. . . This program has proved so successful that IBM is exploring ways to implement it in other large metropolitan areas."

B. Direct Pressure on Real Estate Brokers and Apartment House Owners

"... our top management lowers a pretty hefty economic persuader on the heads of those builders, owners or agents who refuse to sell or rent to our relocating minority group employees. I am a case-in-point and although the

company was not forced to take any formal action when a major builder here refused to sell me the new home we selected, it took him only a few hours to confirm the fact that he would lose considerable sales to my colleagues by the single act of discrimination. So, we got the house!"⁶

—*Black Executive, Eastern Air Lines*

The most common company reaction to discrimination in housing perpetrated on a minority group employee is to exert muscle against the discriminator. In many cases a simple letter or telephone call has been enough, while in a few instances a suit has been brought or threatened. A real estate broker or landlord, when confronted by the threat to his livelihood which corporate removal of business would entail, is likely to conclude that crime doesn't pay.

Beyond interceding in individual instances of discrimination, some companies have attempted to gain across-the-board real estate industry cooperation in obtaining housing for minority group employees.

Intervention by Management. When a black employee of GTE Sylvania, Inc. got the run-around at a large apartment complex near its Danvers, Massachusetts facility, the personnel manager went over to the complex, demanded to see the owner and told him that Sylvania would not tolerate discriminatory treatment of its employees. The apartment was made available.

A black MBA candidate landed a 1971 summer job with Minnesota Mining and Manufacturing Company in Saint Paul. He went to an apartment house and asked for a three-month rental; although these were generally available, he was told "one year minimum". His manager called the apartment owner, told him he was sending his employee back to rent the apartment and hung up. The apartment was rented to the summer employee.

In 1968, IBM Corporation personnel in Lexington, Kentucky became concerned that minority employees assigned to the plant were encountering difficulty in obtaining access to suitable broker listings, despite recent passage of a State fair housing law. As a result, IBM's local management advised the bank administering its Home Guarantee Plan that IBM would do business only with those brokers who would provide service to prospective purchasers on a non-discriminatory basis. This policy was transmitted to the local realty board and its member real estate brokers. There was an immediate and dramatic improvement of brokers' services to IBM's minority employees.

A minority group employee relations assistant working for PPG Industries in Greensburg, Pennsylvania was able to fill out an application and

place a deposit on a suitable apartment—but then could get no answer from the apartment house owner. He complained to the plant manager who called the landlord for an explanation. The apartment was made available.

A real estate broker hesitated to sell a house in a Chicago suburb to a black employee of Allstate Insurance Company, saying that "you wouldn't be happy there". The employee alerted the assistant vice president—personnel who brought in company counsel who proceeded to contact the broker and threaten an injunction lawsuit. The employee got the house.

In Columbus, Ohio in 1970, a black executive of American Urban Corporation was slated to move into a single-family house in a development built by American Urban. Some neighbors began passing out handbills decrying the fact that the developer was selling to a black family. The company's president personally intervened. He told the agitators that his company was going to obey the open housing law and that was that. The neighborhood quieted down and the executive moved in without incident.

Complaints and Lawsuits. Caterpillar Tractor Co. is the only company known to have sued a discriminator in the name of the company. As the quotation from the Federal court complaint indicates (see page 3 above), Caterpillar based its action on the fact that the landlord's discrimination intensified its difficulties in recruiting and promoting minorities. Caterpillar, according to a company spokesman, was "not afraid to become involved in a social problem which we knew would create reactions in the total community".⁹

The company issued press releases both at the time of instituting suit and upon settling the case out-of-court. The employee plaintiff was offered the apartment and was paid \$1,500 in compensation. The same spokesman concluded, "It opened up the eyes of a lot of apartment owners as to what could happen . . . We're convinced that now they know that legally they are in trouble if they discriminate".¹⁰

Another company, Physics International in San Leandro, California brought a complaint to the California Fair Employment Practices Commission on behalf of a group of black Atlanta University students who were to be trainees over the summer and who were given the run-around by a realty firm. Unfortunately, the processing of the complaint dragged on, the students could not obtain housing and were sent back to Atlanta.

A black plant supervisor of Michigan Bell Telephone wanted to move into a predominantly white subdivision in Ann Arbor, Michigan. The neighborhood association tried to prevent it by putting pressure on the realtor. The employee and the company's local public relations manager went to the

city human relations commission to complain, and as a result the employee was able to effect the purchase.

The Buddy System. Some companies relate that a satisfactory method of relocating minority employees is to assign them locally-knowledgeable "buddies". At Goodyear Tire and Rubber, a black employee who went to the same college or is originally from the same part of the country as the newccmer assists him in house-hunting. GTE Sylvania reports that "the presence of a business-attired white man accompanying a black looking for housing can have a very positive effect on the attitude of landlords".¹¹

Requiring Fair Housing Pledges. Reacting to a series of instances where transferring employees were discriminated against by real estate brokers in the Cleveland area, 15 companies with facilities in Cleveland (including General Electric Company, General Motors Corporation, Standard Oil Company, Republic Steel Corporation and Ford Motor Company) jointly decided in April, 1971 to utilize only those realtors whose policy was to show homes on an open occupancy basis.

Under an agreement worked out by the Businessmen's Interracial Committee and the Cleveland Real Estate Board, with the aid of the director of Operation Equality, Cleveland Urban League, real estate brokers were required to sign a non-discrimination pledge as a precondition to obtaining client referrals from the companies, and were expected to live up to the pledge in practice. The companies furnish to employees interested in home-buying or home-selling — either as a result of a company-initiated transfer or otherwise—the names only of cooperating real estate brokers, and indicate that only these brokers are to be used.

The announcement of this program to the public is appended as Exhibit B, page 31, and a General Electric Company directive relating to it is reproduced in part as Exhibit C, page 33.

Another major effort to use corporate influence to open up the real estate market for minorities has been tried in Southern California. There, the Autonetics and Rocketdyne divisions of North American Rockwell Corporation, the Data Systems and Guidance and Control Systems divisions of Litton Systems, and the Hughes Missile Systems Division of Hughes Aircraft Company have made separate mailings to a large number of apartment owners and real estate brokers requesting that they sign a non-discrimination pledge if they wished to do business with new and transferred employees of the company. Litton's Data Systems Division sent approximately 7,000 letters to apartment owners and 1,000 letters to realtors in the San Fernando Valley; it received 113 positive responses from apartment owners and 205 from realtors, a 4% response. Autonetics' letter and accompany-

ing pledge are appended as Exhibits D and E, pages 35 and 36 respectively.

McDonnell Douglas Corporation in St. Louis County similarly requires that brokers and owners sign fair housing pledges before their names or housing accommodations will be listed by the company's housing office. The registrant is informed that "As a condition of listing your property in our housing office, it is necessary that we receive from you a signed statement agreeing to equal treatment of any employee referred to you, regardless of race, color, religion, sex or national origin" Corporate counsel reports that the company has nevertheless had to "black ball" a number of owners and brokers it caught discriminating.

Other companies have adopted a similar tack. Monsanto Company in St. Louis requires a written non-discrimination pledge, as does the Sperry Gyroscope Division of Sperry Rand Corporation on Long Island, New York. General Electric Company in San Jose, California has put together an approved EEO realtor listing. Polaroid Corporation in the Boston area has sent letters to realtors, asking cooperation in placing blacks. A Litton Systems spokesman in Pascagoula, Mississippi reports "pretty good results" from talking with realtors and apartment owners about treating whites and blacks the same way.¹²

An NCR executive in Dayton, Ohio reports that since NCR is the largest employer there the company's informal message to the real estate industry not to give them problems has been heeded. American Telephone and Telegraph in Piscataway, New Jersey has compiled a list of apartments; some landlords said they "want to see a person's face" before renting, and were not included on the list. Procter and Gamble, when transferring a black employee to Jackson, Tennessee, contacted the Chamber of Commerce which recommended a real estate broker who sold the employee a suitable house and arranged a mortgage. Prior to passage of the Federal Fair Housing Act, DuPont in 1966 went directly to about 30 apartment owners in Wilmington, Delaware and asked their cooperation in eliminating discrimination. Many apartments were opened up in this fashion.

American Telephone and Telegraph Company (New York City), Illinois Bell Telephone Company, and Control Data Corporation (Minneapolis) all report that they require the companies who relocate their executives to utilize only non-discriminatory brokers. This requirement is sometimes included in the contract retaining the relocation company.

Gaining assurances of non-discrimination is especially important when a substantial number of employees are moved to a new or enlarged facility. Shell Oil Company reports that, at the time of its 1970 move to Houston, personnel from their relocation office met with realtors and apartment owners groups to inform them that some relocating employees would be

minorities and that the Company expected they would receive equal treatment. Although some smaller real estate operators and homeowners did discriminate, the Company expressed satisfaction with the treatment that minorities received in general. When moving 450 headquarters personnel to Los Angeles recently, Atlantic Richfield Company retained a relocation company which orally informed all realtors it dealt with that they had to act non-discriminatorily. According to the Company, there were no problems related to racial discrimination.

It is also interesting to note that in response to a questionnaire circulated to commercial banks by the American Bankers Association (ABA), 139 banks indicated that they attempted to use their contacts within the real estate community to foster open housing policies by the real estate brokers and homebuilders financed by them.¹³

C. Rental of Apartments; Policy Statements; Contributions to Open Housing Centers.

Apartment Rentals. In Hendersonville, North Carolina, General Electric Company has leased an apartment building with six 2-bedroom units in an all-white neighborhood. The tenants, who are on the average evenly divided between whites and blacks, are Company trainees on 6-months to 1-year assignments at that location. GE subsidizes the rentals.

In the summer of 1969, Polaroid Corporation in the Boston area rented apartments which it made available to minority employees who were newly hired or transferred at Company request.

Fairchild-Hiller brought in a number of engineers, including blacks, to Hagerstown, Maryland 5 years ago. It signed renewable 1-year leases on an apartment in each of three major apartment complexes in town, with the option of renting more. It was made clear to the rental agents that refusal to rent to the Company, specifically for blacks, could lead to pulling other employees out of the complexes. Since the apartments were rented to the Company and not to individual blacks, this insulated apartment owners from backlash to some extent. (This occurred, of course, prior to passage of the Federal Fair Housing Act).

Policy Statements. After some minority employees encountered discrimination, 27 corporations with facilities in Northern New Jersey adopted and publicized a fair housing statement which endorsed "the principle of fair housing for all Americans" and stated that "we do not knowingly cooperate with any individual, firm or agency which discriminates against any of our employees with respect to housing". The statement was coordinated by Esso Research and Engineering Company; full text of the statement with the corporate signatories appears as Exhibit F, page 37.

Minority Housing Council. At its Lynn plant, General Electric Company established a Minority Housing Council in early 1970 to assist new professional minority employees in locating suitable housing. The Council utilizes fair housing organizations and the scattering of real estate brokers who have committed themselves to the program. More recently, it has been broadened to cover housing problems of all minority employees, which has meant focusing on apartment rentals in Lynn.

Contributions to Open Housing Centers. Recognizing the important role that non-profit open housing centers play both in dealing with a community problem and in assisting corporate employees to overcome discrimination, many corporations have given financial assistance to such centers.

In at least two cases, companies have loaned employees to run fair housing centers. The Safety Razor Division of the Gillette Company lent a young black employee, Carl Freeman, to Association for Better Housing to open up an office in suburban Newton, Massachusetts. Paid full salary by the company, he was expected to remain six months, until December, 1972.

The Ran Tec Division of Emerson Electric Company released Kenneth C. Kelly, a black engineer, to direct the Fair Housing Council of the San Fernando Valley (California) for a year in 1969-70. Responding to the initiative of Mr. Kelly, who was president of the Council at the time, the company permitted him to work three days per week at the Council and paid him a high percentage of his regular salary.

The Operation Equality fair housing program of Seattle Urban League lists as "major contributors" the following: Boeing Company, Fisher Flouring Mills, General Telephone Company, Leckenby Steel Company, Lockheed Company, Kampe Construction, Pacific Car & Foundry, Pacific Northwest Bell, Rainier Brewing Company, Retail Merchants Association, Seattle Times, Scott Paper, Simpson Timber Company, Washington Mutual Savings Bank, Washington Natural Gas and Western International Hotels.

Connecticut Housing Investment Fund has received contributions from General Electric, Xerox, Peoples Bank, Pitney Bowes, Northeast Utilities, J.M. Ney, Remington Arms, Remington Electric, Timex, Scovill, Southern New England Telephone, United Illuminating, and Warnaco. County Trust Company and National Bank of Westchester have supported Westchester Residential Opportunities, Inc.

The Morris County (New Jersey) Fair Housing Council has received contributions from Warner-Lambert Corporation and IBM Corporation, and

the Fair Housing Council of Bergen County has been supported by CPC International, Western Union and IBM. Royal Olivetti Corporation and Sussman & Blumenthal have contributed to Housing Now (Hartford). Gillette Research Institute has made a donation to Suburban Maryland Fair Housing Council.

Baltimore Neighborhoods Inc., one of the oldest of the fair housing centers, received almost \$19,000 in 1972 from Operation Push, funded by the Baltimore business community, and has received annual contributions of \$250 and over from Sears Roebuck & Company, the Rouse Company, Baltimore Federal Savings and Loan, Baltimore Gas & Electric Company, Baltimore Life Insurance Company, Chesapeake & Potomac Telephone Company, Commercial Credit Corporation, Fidelity Deposit Company, Monumental Properties, Noxell Corporation, Weaver Brothers and Union Trust Company.

In California, the Fair Housing Council of Orange County has received corporate support from The Equal Opportunity Employers Association of Orange County (\$1,500), and from Hunt-Wesson Foods, Glass Containers Corporation, Aeronutronic Division of Philco Ford, Autonetics Division of North American Rockwell, Ground Systems Division of Hughes Aircraft, Northrup Corporation, Collier Chemical and McDonnell Douglas. Westside Fair Housing Council in Los Angeles has benefited from gifts from General Telephone Company and Ring Brothers Developers.

The ABA survey of commercial banks ascertained that 59 banks contribute to "fair access" housing organizations and that in 1970 44 banks gave \$143,775 to them, an average of over \$3,000 per contributing bank.¹³

A few open housing centers have had capital needs as well as operating needs, and these have also been responded to by business. Connecticut Housing Investment Fund, which is active on a large scale in integrating white neighborhoods throughout Connecticut, has borrowed \$1 million each from Aetna Life Insurance Company, Connecticut General Life Insurance Company, and Travelers Insurance Companies to fund the making of second mortgages to black families integrating the suburbs who lack enough cash for a full downpayment (and to occasional whites whose moves promote racial integration). The companies are partially protected by a Ford Foundation guarantee.

In Chicago, Home Investments Fund, a similar group, has sold 4% and other low interest debentures in 4-figure and 5-figure amounts to Carson, Pirie Scott Foundation, Inland Steel-Ryerson Foundation, Hospital Service Corporation, CNA Foundation, the De Soto Foundation and Quaker Oats Foundation. HIF also has received contributions from the Jewel

Foundation and Illinois Bell Telephone Company. Most of the foundations supporting HIF are company-affiliated or related.

Finally, Aetna Life has loaned funds to Housing Now (Hartford) to assist that organization to make downpayment money available to low income homebuyers under Federal assistance programs.

Other Activities. United Nuclear Corporation, Southern New England Telephone Company and Olin Corporation have included in their in-house newsletters articles which describe the fair housing services of Connecticut Housing Investment Fund. See Exhibit G, page 39. The four major rubber companies in Akron have agreed to publicize the fair housing services of Fair Housing Contact Service (Akron) by distributing its literature to minority employees, displaying posters on bulletin boards and referring minority group employees for aid in securing housing in white neighborhoods.

Pitney-Bowes, Inc. in Stamford, Connecticut has assisted employees in filing applications for apartments in the newly-built Stamford Towers development and other middle-income developments. Cummins Engine Company in Columbus, Indiana, provided information to its employees concerning a new 100-unit single-family development built for moderate income families under section 235 of the National Housing Act.

IV. HOW TO DEVELOP AN EQUAL OPPORTUNITY IN HOUSING PROGRAM

This chapter outlines a scenario for developing a corporate-wide equal opportunity in housing policy and program. The chief actors are the corporate vice president-personnel and the corporate manager or director of equal opportunity programs.

A process is suggested which includes (a) analysis of minority housing problems, (b) identification of company practices and community resources, (c) formulation of a housing policy, with suggested alternative methods of implementing the policy at various facilities, (d) approval of policy and promulgation by chief executive officer, (e) communications with employees, (f) implementation responsibility, and (g) reporting and monitoring.

Assuming that the company has issued an equal *employment* policy directive which gives latitude to take initiatives in the EEO field, this process need not occur at the corporate level. It could occur at the local plant, in which case interaction would be among the EEO officer, personnel director and plant manager, or within a division, involving the divisional EEO manager, personnel vice president and chief executive.

A. Analysis of the Problem

Are minorities having difficulties obtaining suitable housing and, if so, is this having an impact on the company's equal employment opportunity hiring and promotion results?

This is not an easy question to define or to answer, but upon the answers will depend the scope and direction of a corporation's equal opportunity in housing (EOH) program. The corporation will need to know:

Who? Are blacks, Puerto Ricans, Chicanos or other minorities having housing problems? Are these employees at the professional and managerial level, in other salaried jobs, clericals, or in the plant?

When? Does discrimination seem to involve people when they move into the area (new hires or transfers) or are on-board employees involved? Is the problem likely to increase in the future as more minorities are employed?

Where? Is this a problem at all locations or only at some? Are there significant differences of degree of discrimination?

What? Is the problem centered on apartment complexes and landlords or on real estate brokers and homes for sale?

How? How is this discrimination affecting the EEO program? Is it an annoyance or is it having a serious or potentially serious effect?

Obtaining and summarizing this information would be the responsibility of the corporate manager, equal opportunity.

This could be a two-stage process. First, he or she could develop a questionnaire which includes questions such as those asked above (a suggested form appears as Exhibit H, page 40). The questionnaire could be circulated to EEO managers at all divisions and facilities or used during internal EEO field audits. It is unlikely that much hard data will be reported; answers would probably be anecdotal in nature. Second, on the basis of the questionnaires, the corporate EEO manager could interview a cross-section of the respondents and selected minority employees at various facilities to obtain greater depth.

The corporate EEO manager would then summarize the information obtained thus far. Assuming that housing problems have emerged which seem to have an impact on the willingness of minority employees to accept job offers and promotion/transfers, or on employee morale, the corporate vice president—personnel would make the decision to go forward with further investigation and the formulation of a program.

B. Identification of Company Practices and Community Resources

1. Company Practices

Relocation Policy Manual. This document should be reviewed with a view toward its effect on minorities. One critical concern is the time limit for finding a new home or apartment. (As one black employee said at a company Speak Up: "The so-called 'reasonable amount of time off' for house hunting is 'reasonable' only by the white man's yardstick".)¹⁴

Another is the availability of downpayment loans. WRO's experience is that blacks often have a great need for downpayment or second mortgage loans because (a) they have begun to draw good salaries only in the past few years and have thus had little opportunity to lay aside a "nest egg", and (b) blacks are unlikely to have parents or in-laws who are financially able to make a substantial gift.

Home Guarantee Plan. Banks, real estate brokers or executive transfer companies which administer the company's home guarantee plan or otherwise assist transferees to relocate should be required to sign a non-discrimination pledge. Is such a requirement written into the basic contract retaining such companies and is it enforced in practice?

Existing Housing Program. Does the company at any of its locations have a housing office or housing officer? If so, can an EOH program be grafted

onto what is already in place? Also, if the company has taken any EOH initiatives, these should be evaluated.

Minority Advisory Committee. Such a Committee could have tremendous usefulness to the EEO Manager. In this research phase it would be a source of information as to actual housing problems and as to how company interest or lack of interest in EOH programs is perceived by and affects minorities.

2. Community Resources

Open Housing Centers. A fairly complete list of staffed, ongoing non-profit open housing centers appears as Exhibit I, page 41. These organizations are potentially an excellent resource to facilities which are located within their service area. Most centers have had experience in providing a wide range of housing choices for minorities, and in developing cooperative relationships with apartment complex owners, real estate brokers and banks. Local EEO personnel should summarize for the corporate EEO manager the operations of fair housing centers in their areas.

Other Corporations. Are there any metropolitan areas or major suburban counties where other major corporate employers are willing to act cooperatively in EOH matters? The potential for such cooperation can be explored through Chambers of Commerce, Equal Opportunity Employers Associations and Urban Coalitions. In Cleveland, it was the Businessmen's Interracial Committee which set up an employer—realtor accord. (See page 10, above.)

Real Estate Brokers, Apartment Owners and Banks. In each locality where the company has a facility, contact should be made with officers of the realty board, the apartment owners advisory council and the bankers association. Contact should also be made with selected individuals active in these fields. A determination should be made as to likely cooperation from the real estate community.

Elected Officials, Clergy and Other Community Leaders. Community leadership should be approached and the subject of EOH requirements discussed, to gain an impression of whether widespread community support for and understanding of EOH programs can be developed.

C. Formulating an Equal Opportunity in Housing Plan

The company's EOH program will be based on the analysis of the prob-

lem and identification of programs and resources carried out by corporate and local EEO personnel. It will attempt to obtain the greatest possible effectiveness at a cost that the company is willing to incur. The budgeting determination will be key, and will presumably be worked out at corporate, divisional and facility levels as a part of the equal employment opportunity budget.

A fundamental decision will be whether to implement an EOH program throughout the company or to begin with one or several demonstration programs at specified facilities. If minorities have had an especially difficult time obtaining housing at a particular location, a minority rejected a job offer at a certain facility because of housing problems, or an EEO manager at a certain location is eager to become involved in an EOH program, then such a facility might be chosen as a demonstration.

Whether it is one location, several locations, or all locations that are to implement an EOH program, the relevant EEO personnel should consider the following possible components to such a program:

1. Operation of the Program

In the average facility, the program would be run by the EEO manager and his staff. In a large facility which has a housing office or housing officer, the EOH program could be operated by the housing office in close coordination with the EEO staff.

2. Open Housing Centers

If there is a well-operated, staffed open housing center serving the local area, the company could contract with the center for relocation services. Contracts could include a fee for each referral of an employee, a fixed fee for the year, or a two-tier combination as in the case of the WRO contract set forth as Exhibit A, page 29. In lieu of a contractual arrangement, the company might consider a contribution in return for services.

Ground rules respecting eligibility of employees for service and the types of service to be given would have to be carefully worked out. The company should recognize that the open housing center may not always choose the easiest route to obtaining housing for a minority employee. For example, rather than referring an employee to a broker or apartment owner who has a consistently good record of non-discrimination, the center might occasionally refer an employee to a doubtful real estate operator, so as to expand the pattern of compliance with the anti-discrimination law in the community.

3. Relations with Brokers, Apartment Owners and Banks

When dealing with the real estate community directly, rather than

through an open housing center, the company would have to "police" their operations.

Maximum voluntary non-discrimination should be induced through meetings with real estate boards, banking associations and apartment owners associations. If possible, the local plant manager should be the speaker. He should announce that the company has developed an active EOH program under which minorities will be referred directly to them, that the company believes and trusts that no discrimination will be practiced, and that the company is prepared to withhold all patronage from any institution or individual which does discriminate.

No employee, minority or white, should be directed to any real estate broker or apartment house owner who does not sign a non-discrimination pledge. A suggested pledge is appended as Exhibit J (page 48) and refers not only to Federal and State law but also to the Code of Equal Opportunity adopted by the National Association of Real Estate Boards.

When the pledge cards are mailed to brokers, apartment house owners (and banks, if necessary), it would be useful to include a covering letter from the president of the relevant local association, whether of realtors, apartment owners or banks, endorsing this type of pledge.

A list of cooperating realtors and apartment house owners who have pledged non-discrimination should be given not only to minorities but also to white employees who are moving into or out of the area or who come to the housing office for aid in finding a home. It is important that maximum corporate leverage be applied in a quiet way, and it is also useful to "reward" cooperating brokers and apartment owners with referrals of white families (who pose no problems for them in terms of neighborhood or tenant reaction).

Executive relocation agencies, if used, should be required to sign similar non-discrimination pledges, and be required to have the real estate brokers through which they operate sign the pledges.

Any real estate operator caught discriminating should be removed from the approved list.

In most cases, the company will handle these matters by itself, but the possibility of joint action with other corporations should be actively pursued, both before and after the EOH program goes into effect.

4. Escorting; Published Materials

If minority families who are looking for housing wish to have a person to guide and escort them, the company should make such a person available. He or she could either be assigned from the EEO or personnel office or

might be a volunteer from the facility at large. In a couple of cases, corporations and government agencies have asked for volunteers for this purpose and have been gratified by the result. A simple memorandum circulated through the facility should be sufficient.

These escorts, assigned or volunteer, must be given some training. A short course could consist of one-half hour each on the following topics:

How a Real Estate Broker Operates	Taught by an officer of local realty board
Mortgage Financing	Bank Mortgage Officer
Anti-Discrimination Laws	Company Attorney and HUD official
Typical Discrimination Situations and How to Handle Them	Open housing center executive or member of local voluntary fair housing group
Overview: The Minority Employee, His Expectations and Concerns	Company EEO Manager

Kits should be provided for minority homeseekers and escorts. Useful publications would include:

Lists of approved real estate brokers and apartment houses—supplied by company

Materials developed by local open housing center

Up-to-date publications of U.S. Department of Housing and Urban Development (HUD) including:

The Wise Homebuyer
Fair Housing: What It Means to You
Fair Housing USA

Publications of the Veterans Administration including:

Pointers for the Veteran Homeowner
Questions and Answers on Guaranteed and Direct Loans for Veterans
To the Home-Buying Veteran

The EEO office and counsel's office should have copies of "Guide to Practice Open Housing Under Law" (Leadership Council for Metropolitan Open Communities, 407 South Dearborn Street, Chicago, Ill. 60606, \$1.00); "Enforcing Open Housing" by Alexander A. Kolben (Open Housing Center,

New York Urban League, 103 East 125th Street, New York, N.Y. 10035, \$2.00); and "Equal Opportunity in Housing", a loose-leaf service of Prentice-Hall, Inc., Englewood Cliffs, New Jersey.

5. Assistance in Case of Discrimination

Non-Legal Means. If a landlord, homeowner or real estate broker refuses to make a housing accommodation available to a minority employee or prospective employee of the company, a company representative should immediately intervene and attempt to persuade the discriminator to desist. In the case of a landlord or broker, the company should threaten to cut him off from any future business with black or white employees of the company.

At this point, contacts with elected officials, the local human rights commission, clergymen and other community leaders can be utilized. The real estate board can put pressure on a realtor, and an apartment owners association on a landlord. The purpose is to have respected leaders in the community make clear to the recalcitrant party that the "community" does not countenance such law-breaking.

In the case of threats by neighbors, elected officials and the police chief should be brought in, and public declarations against violence solicited from leaders and printed in the newspapers.

Legal Recourse. Even while attempts at conciliation are going on, the company should prepare for a possible legal suit or administrative complaint.

Company attorneys and a local open housing center or fair housing group usually know what kind of a "case" needs to be developed for the courts. Usually, it must be proved that the action of the respondent is racially motivated, by comparing the differing experiences of a white person who attempts to rent the same apartment or buy the same house. For this purpose, a white "verifier" (to verify discrimination) is used who describes himself and his family, job and income as similar or identical to that of the black employee. If, for example, the landlord offers to rent the apartment to the white after he had told the black that there was no apartment available, discrimination is clearly indicated.

(It should also be stressed that, as the above suggests, it is almost impossible for any minority person to protect himself against subtle racial discrimination in housing, without the aid of others—his company, an open housing center, or a white co-worker).

If conciliation fails, the best course is "to make a Federal case out of it" by filing an action for injunctive relief and damages in Federal District

Court. A hearing on the injunction usually comes quickly. It does, however, take substantial legal effort to prepare and file such a case. The company should either make one of its attorneys available (the company is after all hurt by the discrimination as well), pay the costs of legal counsel or arrange for a volunteer attorney or one who will take the case on a contingent fee basis. The strongest course would be to sue in the company's name as co-plaintiff, as in the Caterpillar Tractor case.

The chief alternative to a Federal Court suit is to bring a complaint to the State (or sometimes local) human rights commission. Virtually all northern and western states have such commissions, and there are commissions also in Kentucky, Maryland, New Mexico and Virginia. Experience in New York State is that complaining to a commission is useful if the commission representative will quickly investigate and bring enough pressure on the respondent to obtain the accommodation.

A complaint to HUD under the 1968 Federal Fair Housing Act is another alternative. In those states having fair housing statutes which provide substantially equivalent rights and remedies, HUD will refer the complaint directly to the state agency for investigation. A list of these states is appended as Exhibit K, page 49. In other states, HUD handles the investigation and conciliation itself.

The keystones to a successful approach to combatting discrimination once it has occurred are (a) utilize local leadership, including real estate leadership, to attempt conciliation, (b) commit the company's prestige to conciliation, (c) support the employee, with a company representative physically present, at all stages, (d) take legal or administrative action if necessary, (e) act fast, and (f) respect the employee's desires as to how far he wishes to push—but make crystal clear that the company not only stands behind him but is a full partner in whatever he does. And keep in mind that every company initiative in discrimination situations educates the entire community—leadership and average citizen—to respect minority employees of the company, and minority group persons in general, in the future.

6. Relocation Policy

Changes in the relocation manual may be in order to take into account special needs of minority employees (or these needs may be met outside the general relocation policy).

First, the time allotted to obtain an apartment or buy a home may be insufficient for minorities, and more than the usual number of house-hunting visits by the employee's spouse may be required.

Second, a downpayment loan in an amount appropriately related to the employee's salary should be provided.

7. Home Guarantee

The Home Guarantee Plan should be administered on a non-discriminatory basis. Both the administering institution and the real estate brokers who participate should sign non-discrimination agreements and be removed from the plan if they violate these agreements.

Any (white) employee who discriminates in the sale of his house should become ineligible for participation in the home guarantee plan and the company should refuse to reimburse him for selling costs normally borne by the company.

8. Budget

A budget which reflects the type of program decided upon must be worked out for the corporate, divisional and local levels.

D. Approval and Announcement of EOH Program

The EOH program, developed by the EEO manager and approved by the vice president—personnel, would be approved by the chief executive of the company or management committee.

The chief executive would issue an announcement to all employees describing the EOH policy and program in general terms and appointing a top executive to administer the program. An example of an uncomplicated directive, issued by Northern Illinois Gas Company, is appended as Exhibit L, page 50. A film explaining the program might also be produced, or a section on housing included in any EEO film used to explain the equal opportunity field to employees.

A press release on the EOH program would also be released to the media. Company officials at all levels would inform community leaders of the purposes and likely impact of the EOH program at a series of meetings.

If the EOH program is limited to a facility or division, the divisional president or facility manager, as the case may be, would make the announcement.

E. Communication to Employees

The company should ensure that its equal housing opportunity policy is explained to all employees on a periodic basis. Occasional articles in in-house publications would be useful, especially when a discrimination incident has been taken care of by the company. Notices can be placed on bulletin boards. There can be oral communication through managers. Where applicable, shop stewards can be briefed on the EOH policy and

asked to make sure the rank-and-file understand its implications.

Prospective employees must also be reached. For example, the EOH policy should be publicized on college campuses prior to arrival of the company recruiters. This would be important especially where there might be minority job applicants, but would make a favorable impression on many white students as well.

F. Implementation Responsibility

The EOH program would be administered, under the direction of the vice president—personnel, by the EEO department. Staff and line functions would be divided in the usual way between corporate EEO staff and the local EEO managers and representatives.

Plant managers must be made aware that their performance in the EEO area, including housing, will affect their future progress in the company.¹⁵

G. Reporting and Monitoring

Each local EEO manager would report periodically (perhaps quarterly) to the corporate EEO manager on the progress of the program at his facility. His report would include interviews with all minorities who have relocated in his area in the three month period covered by the report. A recommended report form is appended as Exhibit M, page 51.

The corporate EEO manager would report, perhaps every six months, to the vice president—personnel on the progress of the company-wide EOH program.

The corporate EEO manager would have the responsibility of monitoring performance at the facilities. This would include analysis of the periodic written reports, and field visits to selected facilities. These visits would presumably occur either as part of a general EEO monitoring effort or in response to a crisis situation.

Changes and revisions in the EOH program would occur from time to time as a result of the reporting and monitoring functions.

V. SITE SELECTION

One important way that companies can minimize equal housing opportunities problems for their employees is to exercise care in selecting sites for new plants and facilities.

Adequacy of housing opportunities for minority group employees, meaning the degree of openness of the housing market, should be an important criterion in the selection process. Also, adequacy of housing for low level and middle level employees of all races should be carefully considered as a factor in site selection.

A recent questionnaire poll by the Institute of Human Relations indicated that, of 210 major corporations responding (out of over 1200), 45% considered a suburb's "willingness to provide for an adequate supply of housing for semi-skilled and unskilled workers to be a factor in reaching a decision on plant locations" and 64% believed that "companies have a role to play in securing increased housing for their employees so that they can live within reasonable proximity to their place of work".¹⁶

At Xerox Corporation, a Minority Advisory Committee established at the corporate level has recommended that the adequacy of housing on an open basis be used as a criterion for site selection for new facilities. The site selection process of Quaker Oats Company (which received great publicity when it induced the municipality of Danville, Illinois to pass an open housing ordinance prior to announcing location of a new plant there) includes a study of the target community by equal opportunity staff. Where there have appeared to be problems for minorities in securing housing, or other equal opportunity problems, the potential plant site has been crossed off the list. Similarly, EEO personnel of IBM Corporation participate in selection of plant sites by IBM.

The Community Affairs Director of the Atlanta Chamber of Commerce reports that one of the earliest questions a number of companies considering the Atlanta area ask is: are our black employees going to have problems in the real estate market?

The Federal Government requires that when new facilities are built or leased for Federal agencies by the General Services Administration it must "insure the availability of low and moderate income housing for Federal employees without discrimination because of race, color, religion or national origin...."¹⁷

It is possible that sometime in the future this requirement will be extended to Federal contractors with respect to their own employees. The U.S. Commission on Civil Rights has informally taken this view.¹⁸

It appears to be an open question whether moving to a suburban or other all-white area without providing housing for low and moderate income workers constitutes a punishable wrong, either from a contract compliance standpoint or, for that matter, under Title VII of the Civil Rights Act of 1964.¹⁹

In any event, when opening a new facility or plant, companies can take various actions to ensure that adequate housing on an open basis is provided for their employees. These should occur prior to making the final commitment to a particular site, so as to have maximum leverage or effectiveness.

From the racial viewpoint, the company should make clear to the community's political and business leadership that it expects no racial discrimination in housing against its employees. If adequate assurances on this point are not forthcoming, the company should consider other suitable sites.

From the economic viewpoint, there may not exist adequate housing accommodations for employees of all races at rents they can afford. Again, the community leadership must be willing to take the steps necessary to provide this housing—in many cases under Federal and State subsidy programs. The company can participate through the sale of excess company-owned land to developers, providing seed money to developers, guaranteeing the builder's construction loan, or guaranteeing that a minimum number of units would be rented or purchased by employees of the company. If there was a substantial area differential in housing costs, the company could make loans to employees (especially for downpayments on modest-priced homes) which could be written off gradually if the employee stayed with the company.

VI. CONCLUSION

"(Eliminating discrimination) is not achieved simply by finding a place to live in a particular part of town or in a particular facility for a person from a minority group. It is achieved only when a person who meets the ordinary standards of character and financial responsibility is able to obtain...housing in the same manner as any other person anywhere in the area surrounding his installation, without suffering refusal and humiliation because of his race, color, religion or national origin."²⁰

Minority group employees have a full right to expect that their employers will use their best efforts to ensure that they do not suffer "refusal and humiliation" when seeking to obtain housing, and they do in fact expect such action by their companies.

Elimination of discrimination in the local housing market will aid minority employees of all income levels, not just highly paid professionals and managers. (If low-cost housing is available for whites, then minorities have a potential source of low-rental housing as well).

Adoption of an equal opportunity in housing policy and implementation of an EOH program, together with a site selection policy designed to ensure equal housing opportunity, will go far toward meeting these valid expectations, to the benefit of the company, its minority employees and the community at large.

EXHIBIT A

(IBM Letterhead)

June 6, 1969

Mr. Roger N. Beilenson
Executive Vice President
Westchester Residential Opportunities Inc.
[220 Ferris Avenue]
White Plains, New York 10603

Dear Mr. Beilenson:

This letter sets forth the terms and conditions under which Westchester Residential Opportunities, Inc. ("WRO") will render services to International Business Machines Corporation and its subsidiary companies ("IBM") as an independent consultant.

1. Scope of Work

WRO will provide consulting services to IBM staff with respect to housing as it affects IBM and its employees, especially minority group employees, particularly in the Westchester County, New York, area. In addition, WRO will furnish the following services to individual minority group employees in the Westchester County area: interview prospective homebuyers as to their financial situation and determine whether they are financially able to purchase a house and at what maximum price; assist in finding houses; and arrange mortgage financing, including second mortgage financing by WRO where appropriate and where conventional financing is not available.

2. Term of Service

The term of this agreement shall be from June 1, 1969 through May 31, 1970, renewable for one year terms by mutual consent.

3. Compensation

a. IBM will pay WRO a retainer fee of \$..... for its consulting services to IBM staff. This amount shall be payable quarterly in four equal instalments beginning June 1, 1969. In the event of termination by WRO, or WRO's inability to perform, IBM shall be obligated to pay only that portion of the total amount above specified as the shortened term of the agreement bears to the full original term.

b. In addition, for its services to individual employees hereunder, IBM will pay WRO a fee of \$50 for initial consultation with each employee household and a further fee of \$200 per employee household for all additional services provided to such employee beyond initial consultation. This provision will apply to IBM employees referred to WRO by IBM, or to other IBM employees if WRO first obtains IBM's agreement that such other employees are eligible for assistance hereunder.

c. WRO will submit invoices to IBM monthly for services rendered pursuant to subparagraph b. IBM will pay invoices within 30 days after receipt.

4. General Provisions

WRO agrees that in performing these services it is an independent contractor and consultant. WRO represents and warrants that it is under no obligation or restriction which would interfere with its obligation to provide services hereunder. This agreement shall be construed, and the legal relations between the parties hereto shall be determined, in accordance with the law of the State of New York.

If the foregoing is in accordance with your understanding, please indicate your agreement by dating, signing, and returning to us the enclosed copy of this letter.

Very truly yours,

INTERNATIONAL BUSINESS
MACHINES CORPORATION

By

Agreed to:

Westchester Residential Opportunities, Inc.

EXHIBIT B

THE BUSINESSMEN'S INTERRACIAL COMMITTEE

April 9, 1971

A plan for cooperation in open housing between business corporations and real estate brokers was announced yesterday by Richard B. Tullis, chairman of the housing subcommittee of the Businessmen's Interracial Committee, and Robert H. Arnold, Chairman of the Board of the Cleveland Real Estate Board. Basic purpose of the program is to enable black employees of participating companies to obtain housing without discrimination. In addition, it is believed the program will have a significant effect in reducing discrimination generally.

Discussions between leading realtors and members of the housing subcommittee of the interracial organization were initiated after several large business corporations reported difficulties in employing or transferring black professional and managerial people. Upon accepting offers to work in Cleveland, some of the black employees had trouble in locating residences in areas where they could afford to live. Several declined good job offers because of failure to find suitable housing.

After meetings running over a period of a year, the housing subcommittee and concerned realtors have agreed on a joint program which provides:

"A list will be made naming industrial and other employers who adopt a policy of actively promoting observance of the Fair Housing Laws by encouraging their employees to list their property with real estate brokers whose policy it is to show property on an open basis. These employers in their own real estate transactions also will deal with such brokers. Every employer in the Cleveland Metropolitan Area adopting such policy and desiring to be named in the list will be included therein.

"Real estate brokers will be encouraged to adopt a policy of showing all available homes which meet the purchasers' requirements, in the respective areas which they service, without regard to race, color, creed or national origin, and to record this commitment with the employers for whom they wish to provide real estate service and for referral to the latter's employees.

"In case an employer is interested in the sale or pur-

chase of a property by an employee, by reason of an employer-initiated transfer or otherwise, the employer will furnish the employee with the names of cooperating brokers.

"Subscribing companies will be asked to give periodic reports of their experiences under the plan. A committee selected by participating brokers and by the employers will meet quarterly for the purpose of reviewing and analyzing progress on the program."

To date, 20 large corporations and an equal number of real estate brokers have joined the program.

EXHIBIT C

(General Electric Company Letterhead)

October 27, 1970

TO: DIVISION STAFF
SECTION MANAGERS
SUB-SECTION MANAGERS (CLEVELAND AREA)

Gentlemen:

Some of you are aware that in the past several years we, along with several other industries in the Greater Cleveland area, have encountered difficulties in recruiting and hiring minority professional people from outside the Cleveland area because of housing problems. While the laws are fairly clear on housing, there are many situations that seem to occur that do not provide a full range of selection to certain people.

We have had a few classic examples within our own Division. In several cases, both in our business and in others, prospective employees have chosen not to accept a position because of the problems that they encountered in the housing market.

A Task Force of businessmen on which we were represented worked on a solution to this problem with representatives of the real estate industry. They found that there are a number of realtors genuinely interested in affirmatively promoting fair housing who need broad industry and community support. It appeared that most of the realtors are willing and anxious to cooperate, but a number may be concerned about taking the lead or suffering economic reprisal for breaking past patterns.

To help correct this, the solution worked out by the Task Force of the Businessmen's Interracial Committee and realtors is as follows:

(For Text, See Exhibit B)

Based on this, I am writing to inform you that it will be our policy to attempt, in all cases, to place business with realtors who have pledged in writing a policy to show properties available to them for sale or rental without discrimination based upon race, color, creed or national origin.

We are asking you, as managers, to provide all employees being transferred in or out of Metropolitan Cleveland, and prospective employees being

hired, with this list of realtors, including the explanation for the reason of our support. For your information, we have attached a copy of the statement realtors will be given the opportunity to sign. The Relations Operation will provide a list of realtors for your use in advising transferred employees or new hires from outside Cleveland as soon as it is completed. Periodically, it will be updated as additional realtors join the program. In addition, a brief statement is attached which should be used by you in communicating to those employees affected which explains our purpose.

We and others did not reach this decision lightly. It resulted only from the gravity of the problem we and other industries face as we move forward in the area of equal opportunity. Ohio law bars discrimination in the sale or rental of housing accommodations, but we and other employers and employees still run into difficulties. This voluntary cooperative program of industry and realtors recommended by the Businessmen's Interracial Committee may help to promote observance of the law and to prevent subtle actions that can take place which lead to the problems an employer has in recruiting, transferring and holding competent employees.

We believe this is a sensible and practical way of helping real estate organizations in Cleveland recognize that they will have wide backing and support by affirmatively working to promote Fair Housing in accordance with present law. We would hope that within a reasonably short time all responsible real estate firms would be happy to give the assurances requested.

(Final 2 paragraphs omitted)

R.V. CORNING
Vice President and General Manager

EXHIBIT D

(Autonetics Letterhead)

As you know, Autonetics is Orange County's largest employer. We consequently bring a great many new people into the area—people from all parts of the country—people with a wide variety of skills, talents, professions, and recreational interests. They represent a tremendous potential in the continued orderly development of Orange County's fast-growing residential communities.

Our employment practices, of course, come under the provisions of the Equal Employment Opportunity Commission, the Office of Federal Contract Compliance, and the California Fair Employment Practice Commission.

In many ways we try to contribute to the solution of housing problems in the areas where our presence affects the population. We have always enjoyed the fullest cooperation from many of you and want to expand the list of those who will serve our employees.

Now, in our effort to be a little more specific in directing new employees to real estate brokers, subdivisions, and apartments in the areas of their choice, we are compiling a registry of those who have given us an indication of their intent to conform to the CREA Code of Practices. Will you please sign the enclosed statement and return it in the enclosed, prepaid envelope to the attention of Francis N. Laird, Dept. 051-40, CC39.

We will deeply appreciate this gesture on your part, and our continuing cooperative relationship as we work toward common objectives in Orange County.

Yours very truly,

AUTONETICS

S. F. Eyestone
President

EXHIBIT E

APARTMENT HOUSE OWNERS AND MANAGERS

TO: AUTONETICS—NORTH AMERICAN ROCKWELL CORPORATION
Attn.: Francis N. Laird, D/051-40, CC39

SUBJECT: STATEMENT OF INTENT TO RENT/LEASE
TO AUTONETICS' EMPLOYEES

I hereby agree to rent/lease, to Autonetics' employees regardless of race, color, religion or national origin. I agree that I will not require variations from posted rules, regulations, cleanup costs, etc. because of ethnic background of employee.

Date

.....
Signature

EXHIBIT F

STATE OF NEW JERSEY OFFICIAL PRESS RELEASE

July 21, 1971

Director James H. Blair of the New Jersey Division on Civil Rights announced that twenty-seven (27) Equal Opportunity Employers with major operations in Northern New Jersey have jointly endorsed a statement advocating open housing for their employees.

The firms agreed unanimously that this action was necessary in light of the discrimination encountered by minority employees when seeking housing accommodations.

Very encouraged, Blair said "I am happy to see this business sector of our community issue and abide by such a positive declaration. It will have a chilling effect on discrimination. We have today taken another significant step forward in our journey to eradicate the discrimination that plagues our present society." Blair concluded that, "one Division on Civil Rights, one agency of State Government, cannot possibly eliminate the rampant discrimination that years of intolerance have embedded in our present society."

The statement reads, in part, that the firms "endorse the principle of open housing for all Americans," and that they "do not knowingly cooperate with any individual, firm or agency which discriminates against any of our employees with respect to housing."

"We hope that others will adopt similar statements," said Dr. Neil V. Hakala, President of Esso Research and Engineering Company, which coordinated the statement. "Open housing is a vital step toward the full cooperation necessary within our society to achieve equal opportunity for all."

The complete statement and a list of the firms are included on the second page of this release.

"As firms with operations in the State of New Jersey, we endorse the principle of open housing for all Americans. We believe that anyone, regardless of race, color, creed, national origin, sex, or marital status, has the right to live in any apartment or house that he can afford to rent or buy. We support the New Jersey Law Against Discrimination in housing and we will continue to cooperate with appropriate agencies in upholding the State's open housing law. We do not knowingly cooperate with any individual, firm, or agency which discriminates against any of our employees

with respect to housing. This position is fully consistent with the policies that provide for equal rights in hiring, promotion, and all other phases of our businesses."

Companies that have endorsed the statement are:

Airco Welding Products Division of Air Reduction Company, Inc. - Union
Allied Chemical Corporation - Morris Township
American Cyanamid Company, Inc. - Wayne
Bethlehem Steel Corporation - Elizabeth
Bristol-Myers Company - Hillside
Celanese Research Company - Summit
CIBA Pharmaceutical Company, Division of CIBA-GEIGY Corporation - Summit
E.I. duPont de Nemours & Company's Grasselli Plant - Linden
Enjay Chemical Company's Bayway Chemical Plant and Florham Park Operations
Esso Mathematics & Systems Inc. - Florham Park
Esso Research and Engineering Company - Linden and Florham Park
Foster Wheeler Corporation - Livingston
Hercules Incorporated - Kenvil
Hewlett Packard - Berkeley Heights
Hoffman - La Roche Inc. - Nutley
Humble Oil & Refining Company's Bayway Refinery and New Jersey Marketing Facilities - Linden
Merck & Co., Inc. - Rahway
Monsanto Company - Kenilworth
Phelps-Dodge Copper Products Corporation - Elizabeth
RCA Corporation - Avenel
Schering Corporation - Bloomfield
Sea-Land Service - Port Elizabeth
Simmons Company - Elizabeth
Tenneco Chemicals, Inc. - Piscataway
The Singer Company - Elizabeth
United States Gypsum Company - Clark
Warner - Lambert Pharmaceutical Company - Morris Plains

EXHIBIT G

TARGET — May 21, 1971

(Olin Corporation)

SUBURBAN HOUSING HELP FOR MINORITIES

Minority group employees interested in buying a house in the suburbs can obtain assistance without cost from Connecticut Housing Investment Fund (CHIF).

CHIF is a private, non-profit, non-government-connected corporation. Its aim is to make it easier for minority group families to purchase property in suburban areas. It also assists white families in purchasing houses in sound integrated neighborhoods.

CHIF offers professional real estate and financial advice, plus assistance in finding the house of your choice and in securing mortgage money. It can also lend money for the down payment at reasonable interest rates.

A family's income should be sufficient to meet mortgage payments and other expenses of owning a house. To determine ability to pay, CHIF takes into consideration other jobs in the family. Most of the families assisted have income on the basis of between \$7,500 and \$14,000.

CHIF is financed by a group of Connecticut insurance company executives, financial leaders and businessmen who are interested in a practical, socially responsible approach to open housing.

Details may be obtained in pamphlets placed on counters in Personnel and Security Departments, 8-E-1.

If you are interested, contact Mr. Bernard Burg, New Haven Director, CHIF, 770 Chapel St., New Haven telephone: 787-5929.

EXHIBIT H

ANALYSIS OF EQUAL OPPORTUNITY IN HOUSING SITUATION

Facility

(Explain each answer as fully as possible)

1. Are minorities having difficulty in obtaining housing?
2. Which minority groups (blacks, Spanish-surnamed, etc.)? Any difference in treatment?
3. What job levels are involved (professional, clerical, operatives)?
4. Do problems center around new hires? transferees? on-board employees?
5. What are the problems? Discrimination? High cost of homes or apartments? Lack of knowledge of area? Uncertainty?
6. Is discrimination a greater problem at apartment complexes? real estate brokers? banks?
7. What if any steps has your facility taken to deal with problems?
8. Have you met with executive of local fair housing center? board of realtors? apartment owners association? bankers association?
9. Can you use help from corporate EEO department? How?
10. Do you have any suggestions for corporate EOH policy and program?

Name / Title

Date:

EXHIBIT I

MAJOR OPEN HOUSING CENTERS

NATIONAL

NAACP
1790 Broadway
New York, New York 10019
212-245-2100
Attn: William R. Morris
Director of Housing Programs

National Committee Against
Discrimination in Housing, Inc.
1425 H. Street, N.W., Room 410
Washington, D.C. 20005
202-783-8150
Attn: Edward L. Holmgren
Executive Director

(NCDH office also at)
250 West 57th Street, Room 2003
New York, New York 10019
212-265-2780

NCDH/HUD California Project
680 Beach Street, Suite 346
San Francisco, California 94109
415-771-8490
Attn: Mrs. Aileen C. Hernandez

National Urban League
55 East 52nd Street
New York, New York 10022
212-826-6340
Attn: Glenn A. Claytor, Director
Div. of Housing & Urban Development

CALIFORNIA

Midpeninsula Citizens for Fair Housing
457 Kingsley Avenue
Palo Alto, California 94301
415-327-1718
Attn: Mrs. Mary Davey
Director of Fair Housing

Fair Housing Council of the San
Fernando Valley
6025 Sepulveda Blvd.
Van Nuys, California 91401
213-781-6940
Attn: Mrs. Celia Zager
Executive Director

Fair Housing Congress of Southern
California
4034 Buckingham Road, Suite 212
Los Angeles, California 90008
213-299-4424
Attn: Lois Moss
Executive Director

Housing Opportunities Center of Greater
Los Angeles
4034 Buckingham Road
Los Angeles, California 90008
213-296-6840
Attn: George Parks, Executive Director

Fair Housing Foundation of Long Beach
4108 East Seventh Street
Long Beach, California 90804
213-433-6717
Attn: Mrs. Faith Kortheuer, Executive Director

COLORADO

Metro Housing Center
860 Elati Street
Denver, Colorado 80204
303-893-9788
Attn: William J. Haring, Director

Housing and Neighborhood Improvement
Program
Urban League of the Pikes Peak
Region, Inc.
127½ South Tejon, Suite 203
Colorado Springs, Colorado 80902
303-634-1771
Attn: James E. D'Entremont, Director

Westside Fair Housing Council
11669 Santa Monica Boulevard
Los Angeles, California 90025
213-473-0949
Attn: Dorothy Gilbert
Executive Director

Orange County Fair Housing Council
1405 West Santa Ana Boulevard
Santa Ana, California 92703
714-835-0160
Attn: Camille Beason
Executive Director

CONNECTICUT

Connecticut Housing Investment Fund
121 Tremont Street
Hartford, Connecticut 06105
203-233-5165
Attn: George D. Edwards, Executive Director

DISTRICT OF COLUMBIA

Housing Opportunities Council of
Metropolitan Washington
1522 K Street, N.W., Suite 406
Washington, D. C. 20005
202-833-8673
Attn: James H. Harvey, Executive Director

ILLINOIS

Home Investments Fund
116 South Michigan Avenue
Chicago, Illinois 60603
312-641-1035
Attn: Paul A. Epstein
Executive Director

Leadership Council for Metropolitan
Open Communities
407 South Dearborn Street, 13th Floor
Chicago, Illinois 60605
312-341-1470
Attn: Kale A. Williams
Executive Director

KENTUCKY

Kentucky Housing Opportunity Centers, Inc.
1111 West Broadway
Louisville, Kentucky 40203
502-582-3815
Attn: Carl Hines
Executive Director

MARYLAND

Baltimore Neighborhoods, Inc.
32 West 25th Street
Baltimore, Maryland 21218
301-243-6007

Attn: George B. Laurent
Executive Director

Suburban Maryland Fair Housing, Inc.
9601 Cedar Lane
Bethesda, Maryland 20014
301-949-9040
Attn: Alyce MacCallum
Office Manager

MASSACHUSETTS

Association for Better Housing, Inc.
1257 Blue Hill Avenue
Mattapan, Massachusetts 02126
617-296-8000
Attn: Rev. Harold G. Ross, Jr.
Executive Director

MISSOURI

Greater St. Louis Freedom of Residence
Committee
5868 1/2 Delmar Boulevard
St. Louis, Missouri 63112
314-862-1118
Attn: Mrs. Hedy Epstein, Executive Director

County Open Housing
Concordia Seminary
801 DeMun — Box 405
Clayton, Missouri 63105
315-862-4546

Urban League of St. Louis
3701 Grandel Square
St. Louis, Missouri 63108
314-371-0040
Attn: William C. Douthit, Executive Director

Housing Information Center
Greater Kansas City Council on Religion and Race
1026 Forest
Kansas City, Missouri 64106
816-471-1515
Attn: Mrs. Ruth G. Schechter, President

NEW JERSEY

Morris County Fair Housing Council
Box 773
Morristown, New Jersey 07960
201-538-2975
Attn: Mrs. Barbara Wilson
Program Director

Fair Housing Council of Bergen
County
109 Main Street
Hackensack, New Jersey 07601
201-489-3552
Attn: Mrs. Lee Porter
Executive Director

NEW YORK

New York Urban League Open Housing Center
150 Fifth Avenue, Room 303
New York, New York 10011
212-691-7700
Attn: Mrs. Betty Hoeber, Director

Westchester Residential Opportunities, Inc.
470 Mamaroneck Avenue
White Plains, New York 10605
914-428-4507
Attn: Roger N. Beilenson
Executive Vice President

Corporate Personnel Housing Program
Urban League of Westchester County
60 Union Avenue
New Rochelle, New York 10801
914-576-1200
Attn: Mrs. Sidonia Trommer, Director

Nassau County Commission on Human Rights
320 Old Country Road
Garden City, New York 11530
516-535-3663
Attn: Linda Leaf
Director, Open Island

Suffolk Housing Services, Inc.
Smith Haven Ministries
Smith Haven Mall
Lake Grove, New York 11755
516-724-6920
Attn: Diane Murphy
Director

NORTH CAROLINA

Winston-Salem Citizens for Fair
Housing, Inc.
310 West Fourth Street, Suite 721
Winston-Salem, North Carolina 27101
919-723-7945
Attn: Ruby O. Cain
Executive Secretary

OHIO

Operation Equality
Cleveland Urban League
4102 Lee Road
Cleveland, Ohio 44128
216-295-1600
Attn: Joseph H. Battle
Director

Fair Housing Contact Service
P.O. Box 8065
Akron, Ohio 44320
Attn: Dr. Juliet Saltman
President

HOME of Greater Cincinnati
2400 Reading Road
Cincinnati, Ohio 45202
513-721-1555
Attn: Patrick Hornschemeier
Executive Director

Housing Opportunity Center of
Metropolitan Columbus
700 Bryden Road, Suite 301
Columbus, Ohio 43215
614-228-0851
Attn: Carl White
Executive Director

Dayton Housing Opportunity Center
16 North Ludlow Street
Dayton, Ohio 45402
513-225-5378
Attn: Mrs. Joyce Teegardin, Director

PENNSYLVANIA

Housing Information Center
Philadelphia Urban League
5208 Chestnut Street
Philadelphia, Pennsylvania 19139
215-748-1147
Attn: Mrs. Patricia Ormes
Director

Housing Association of Delaware Valley
1601 Walnut Street
Philadelphia, Pennsylvania 19103
215-563-4050
Attn: Shirley Dennis
Managing Director

TEXAS

Greater Dallas Housing Opportunity Center, Inc.
426 Wilson Building
Dallas, Texas 75201
214-748-1034
Attn: Jane H. Greene
Office Director

EXHIBIT J

NON-DISCRIMINATION PLEDGE — REALTORS

This realty firm hereby agrees to give service to all employees of XYZ Corporation without discrimination on account of race, color, religion or national origin. All salesmen have been carefully instructed as to the meaning of this policy.

This policy is based on the Federal Fair Housing Act of 1968, Supreme Court decisions, the Human Rights law of this State, and is in accordance with the Code of Equal Opportunity of the National Association of Real Estate Boards of which we are a member.

Dated:

.....
Signature and Title

EXHIBIT K

The following states and localities provide "rights and remedies" for discrimination in housing substantially equivalent to those provided by the Federal Fair Housing Act of 1968:

Alaska, California, Colorado, Connecticut, Delaware, Hawaii, Indiana, Iowa, Kansas, Kentucky, Maryland, Massachusetts, Michigan, Minnesota, Nebraska, Nevada, New Hampshire, New Jersey, New Mexico, New York, Ohio, Pennsylvania, Rhode Island, Vermont, Washington, West Virginia, and Wisconsin. Also, Washington, D.C.; Dade County and Riviera Beach, Florida; Aurora, Peoria, Springfield, and Urbana, Illinois; Ann Arbor, Michigan; Kansas City, Missouri; Omaha, Nebraska; New York and Schenectady, New York; Philadelphia and Pittsburgh, Pennsylvania; Mercer Island, Washington; and Charleston, West Virginia.

EXHIBIT L

Northern Illinois Gas Company

EFFECTIVE: March 11, 1970

POLICY ORDER A-5

SUPERSEDES:

SUBJECT: Fair Housing
Opportunities

REFERENCE: Policy Order E-5

The Company believes that an individual's freedom of choice in housing is as basic as his freedom of choice in voting. Housing should be available commensurable with an individual's ability to purchase or lease without regard to race, creed or national background.

The Company believes that good corporate citizenship requires it to take affirmative actions to eliminate housing opportunity injustices by assisting its employees in locating and purchasing or leasing suitable housing near the work location.

The following guidelines for implementing this policy establish that the Company will:

1. Offer assistance to all employees in locating their choice of housing near any assigned work location.
2. Have available the name or names of real estate and financial institutions which are active in promoting open housing.
3. Actively support employees who have been discriminated against by identifying and contacting with the employee the appropriate civic group or Human Relations Commission. If the employee should desire to press court action, the Company will direct the employee to legal groups known to pursue cases of this type.
4. Make available for purchase of a home, a down-payment loan in an amount appropriately related to the employee's monthly salary.

The Vice-President—Personnel will have responsibility for the administration of the above policy as it affects employees. In order to obtain uniform interpretation of this policy, any questions of interpretation or application should be directed to him.

Marvin Chandler
Chairman

EXHIBIT M

EQUAL OPPORTUNITY IN HOUSING REPORT OF EEO MANAGER.

For Quarterly Period Ending, 1973

1. Number of professional/management minorities newly hired or transferred to facility during period:
2. Was each such employee assisted by company in housing search?
3. Describe method(s) of company assistance. Examples: referral to open housing center, use of non-discriminatory real estate broker or apartment house owner.
4. Was company escort offered to each minority?
Did minority utilize the escort?
5. Was any difficulty—especially discrimination—encountered? If so, describe problem and company's method of dealing with problem.
6. Did EEO staff interview each minority after he/she located housing? Was each minority satisfied with housing result and company aid?
7. Are minorities not in salaried positions having difficulties with housing? If so, what steps have you taken to help?
8. Summarize the EOH program at your facility. (If no change since last report, state "no change").
9. Each minority new hire or transferee should be interviewed after he obtains housing. On the basis of these interviews, is there any relevant information to add?

Name/Title/Facility

FOOTNOTES

1. Published in the Federal Register on December 4, 1971. (36 Fed. Reg. 23152, 41 C.F.R. Sec. 60-2 (Supp. 1972). Emphasis in section 60-2.23 quotation is added.
2. February 5, 1970 (35 Fed. Reg., Vol. 25, 1970).
3. 41 C.F.R. Sec. 60-2.23 (Supp. 1972).
4. Interview with William J. Kilberg, Associate Solicitor, U.S. Department of Labor, August 29, 1972.
5. Interview with Martin E. Sloane, Assistant Staff Director for Civil Rights Program and Policy, U.S. Commission on Civil Rights, August 28, 1972.
6. Memorandum entitled "General Electric Company: Special Housing Programs" dated July 27, 1972, prepared by Joyce A. Lawson, Consultant—EO/MR, General Electric Company, on file at WRO.
7. Letter of Edward T. Buhl, then Managing Attorney, IBM Corporation, to Leonard Schramm, HUD, dated January 14, 1972, on file at WRO.
8. Letter of J.O. Plimpton, Jr., Division Vice President, Eastern Air Lines Incorporated, dated November 10, 1971, to Roger N. Beilenson, on file at WRO.
9. Letter of Jim Folck, Community Affairs Manager, Caterpillar Tractor Co., to Ms. Hedy Epstein, Greater St. Louis Committee for Freedom of Residence, dated June 15, 1972, on file at WRO.
10. Telephone interview with Mr. Folck, August 15, 1972.
11. Letter of Paul K. Alexander, Personnel Development Manager, Lighting Products Group, GTE Sylvania, Inc., to Roger N. Beilenson, dated November, 1972, on file at WRO.
12. Telephone interview with Claude A. Culpepper, Manager, Community Services, Litton Ship Systems, July, 21, 1972.
13. "Urban and Community Affairs; A Banking Survey" (The American Bankers Association, undated).
14. Cited in undated memorandum (circa 1/1/69) of E.T. Buhl and M.S. Landa, of IBM Corporation legal staff; memorandum on file at WRO.
15. David J. Dillon, Manager of the Columbia, Maryland Relations and Utilities Operation for GE stated: "... carrying out the company's commitment to equal employment and minority relations . . . is one of the

two or three major indications of my performance and the quality of this performance will have a direct bearing on my future progress with the company". Hearings before the U.S. Commission on Civil Rights (Baltimore, August 17-19, 1970) at p. 906.

16. "Composite Response by 210 of the leading Corporations throughout the Country", unpublished, on file at WRO.
17. "Consideration of Socioeconomic Impact When Selecting Locations for Federal Buildings", a regulation of General Services Administration, June 7, 1972 (37 Fed. Reg. 11323). See also Executive Order 11512, February 27, 1970. (35 Fed. Reg. 3979).
18. During a press conference at the time of issuing a report entitled "Federal Installations and Equal Housing Opportunity" (March, 1970), a Commission spokesman stated that its recommendations related to Federal *agencies* should also apply to Federal *contractors*. Interview with Martin E. Sloane, Assistant Staff Director for Civil Rights Program and Policy, U.S. Commission on Civil Rights, August 28, 1972.
19. With respect to Title VII, a staff memorandum of the Equal Employment Opportunity Commission dated July 7, 1971 took the position that a company which moves facilities to an area of low minority population violates Title VII, unless it takes steps to assure equal employment opportunity through housing construction, transportation arrangements or by other means. This has not been adopted as official EEOC policy.
20. Equal Opportunity in Off-Base Housing Program (U.S. Department of Defense, March 2, 1972), 37 Fed. Reg. 4334; C.F.R. Tit. 32, Ch. 1, Subch. Q, Sec. 301.4(b).

DEPARTMENT OF HOUSING
AND URBAN DEVELOPMENT

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Westchester Residential Opportunities, inc.

Equal opportunity in housing ...

[illegible]

HUD-750 (5-70)



November 1973



HUD-EO-45