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# Changing Populations, Rules, and Roles

# Conflict and Ambiguity

Mary K. Grant, Ph.D.

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*Over the past ten years, public housing agencies across the country have been allowed greater discretion in the implementation of policies that affect public housing management and who will live there. Discretion in public management has the potential to be a slippery slope. While managers may have greater flexibility in responding to local need and making the best use of the limited resources available to public housing, the potential exists for risk of conflicting interpretation of policies, unclear program goals, and a conflict in roles, for example, What exactly is my job and how do I manage in this new environment? The author examines these issues against the backdrop of mixed populations, namely, housing policies that enable low-income individuals with disabilities to become eligible for what has traditionally been considered housing for the elderly.*

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In my research, on which this article is based, I examined a number of laws with implications for publicly funded housing for the elderly, beginning with the federal Fair Housing Amendments Act (FHAA) of 1988 and culminating with the passage, in 1995, of Massachusetts Chapter 179, the Mixed Population Legislation. I gained additional data during interviews with managers of publicly funded housing and a statewide survey of public housing authorities.

The FHAA explicitly included eligibility for persons with psychiatric disabilities, as well as those whose impairment is caused by alcohol and substance abuse, to reside in housing for the elderly. In comparison with other pieces of legislation enacted simultaneously, the FHAA served as a catalyst for the emotionally charged and complex issue of mixing the elderly with younger disabled persons in the same housing developments. Subsequent pieces of legislation have sought to expand and protect the rights of the affected populations, specifically, the Americans with Disabilities Act (ADA), while others (Title VI) have attempted to remedy the impact of the FHAA on elderly/handicapped housing.

The extent and origin of the resulting problems can be viewed from a number of perspectives. Some housing managers and advocates for the elderly maintain that many of the difficulties within housing for the elderly can be attributed to legislative action and policy decisions that broadened the definition of disability, thus creating easier access to this housing for the non-elderly. Still others maintain that provisions to house people with disabilities were always present within the enabling legislation establishing housing for the elderly. Few familiar with this issue believe that housing these two populations together is an ideal solution, particularly when the mix involves those who are very old and younger persons with psychiatric disabilities or disabilities related to substance abuse.

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When confronted with truly difficult policy decisions, particularly those which involve questions of distribution and equity, we look increasingly to legislative solutions. The imposition of rules has somehow become a remedy for injustice.<sup>1</sup> Rules, particularly those backed up by enforcement mechanisms, can depersonalize issues and lend a sense of objectivity to the decision-making process. It is also true that those affected by the rules — in this case tenants and managers — experience highly personal and extremely subjective feelings. The decision-making process can then be viewed as having a “neat” dividing line, clearly and dispassionately determining who’s in and who’s out. The unfortunate dilemma is that on either side of the line are representatives of relatively powerless groups whose relative powerlessness necessitates legislative protection to ensure that their basic needs are met. Sometimes, however, the cure may be worse than the ailment, and the unintended consequences of the protection — read legislation — may result in further victimization.

The true problem, which is avoided, is not having adequate housing options for either population; thus, policymakers tinker with the rules. Legislation such as the Federal Fair Housing Amendments has been cited by some as a catalyst to the escalating tensions within publicly funded housing for the elderly. But the anxieties may have more to do with the changing needs of tenants who reside in this housing and the burden being placed on housing managers to cope with these needs in an environment of diminishing resources. Additionally, the problems within a building may be further complicated by the conditions in the surrounding community: if the neighborhood is troubled there is a greater likelihood that the building may be troubled.

I examine the complexity of managing within this environment, drawing upon the considerable body of knowledge concerning public policy implementation and the role of street-level bureaucrats.<sup>2</sup> However, the street-level bureaucrats in this case — public housing managers — may require new kinds of training to deal with their shifting responsibilities. Managers may be deft at implementing, or not implementing, a procedure, but dealing with changing, complex human needs may be either a skill with which they are unequipped or one that was not part of their original set of assumptions concerning their roles. Housing managers who signed on to manage property have, by default, acquired a range of new duties and responsibilities. Confronted with an aging and frailer population, and in the absence of an adequate array of housing options for people with disabilities, housing management will continually be challenged; tenants with different needs and abilities, regardless of age, may be at risk.

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### **Mixed Populations: A Legislative Synopsis**

The following pieces of legislation have contributed to the mixed population dilemma and to the complexities of managing publicly funded housing for the elderly. I have briefly summarized several key components within each piece of legislation.

#### ***The Federal Fair Housing Amendments Act***

In September 1988, the U.S. Congress passed the Fair Housing Amendments Act. Prior to enactment, individuals with physical or mental disabilities were excluded from the housing discrimination provisions of Title VIII of the Civil Rights Act of 1968. In amending Title VIII, the FHAA included people with disabilities as a protected class under the law, extending to them the principle of equal housing opportunity.

In addition to its prohibition of discrimination on the basis of disability or the perception of disability, the FHAA constrains a landlord's ability to deny a tenant's wish for a "reasonable" accommodation. Among the more controversial sections of the act was broadening the term "disability" to include, specifically, persons with mental illness, persons recovering from alcohol and/or substance abuse, and persons with HIV/AIDS as protected groups.

### ***The Americans with Disabilities Act***

Widely hailed as a civil rights law for people with disabilities, the Americans with Disabilities Act (ADA) of 1990 bars discrimination because of a physical or mental infirmity in employment, transportation, telecommunications, and public accommodation. The ADA defines disability broadly as a physical or mental impairment that substantially limits one or more of the major life activities, having a record of such impairment, or being regarded as having such impairment.

Among the covered disabilities are mobility, visual, speech, and hearing impairments, neurological disabilities, cancer, heart disease, mental retardation, mental illness, HIV, drug addiction, and alcoholism. Users of illegal drugs are not protected under the ADA. Major life activities include the ability to care for oneself, performing manual tasks, walking, hearing, seeing, speaking, breathing, learning, and working. Similar to the FHAA, the ADA prohibits discrimination because of a person's disability, perception of disability, or association with people with disabilities.<sup>3</sup>

### ***Title VI of the Housing and Community Development Act of 1992***

As noted by the "Loose Association of Legal Services, Housing Advocates, and Clients" in passing Title VI, Congress wished to "balance the needs of Public Housing Authorities (PHAs) to operate housing that would meet the perceived special needs of elders with the civil rights and service needs of people with disabilities."

Under Title VI, the definition of eligibility for elderly housing changed; disabled and handicapped persons no longer are included within the definition of "elderly families," now being referred to as "disabled families." Additionally, a definition for the near-elderly — persons between the ages of fifty and sixty-one — has been appended. Title VI also gave PHAs the authority to set aside public housing projects or portions of them for the exclusive occupancy of (1) elderly persons only; (2) disabled persons only; and (3) a mixed site of elderly and disabled persons. PHAs, as well as owners of housing subsidized through the Section 8 program, are allowed to institute a cap on the number of non-elderly disabled tenants. Preference may also be given to near-elderly families.

### ***Chapter 179: Mixed Populations***

In October 1995, the Massachusetts legislature passed Chapter 179 of the Acts of 1995. An Act Improving Housing Opportunities for Elders and Non-elderly Persons with Disabilities, which established a cap on the number of non-elderly persons with disabilities who can reside in an elderly housing building or development. Under the law, persons under the age of sixty with disabilities, who otherwise meet the eligibility requirements for subsidized housing, will have preference for 13.5 percent of the units within state-funded, Chapter 667, elderly/disabled public housing developments. Eligible elders will have preference for 86.5 percent of the units. The law also established the Alternative Housing Voucher Program, a rental assistance arrangement that allows eligible non-elderly disabled persons the option of obtaining a rental subsidy with which they can rent an



appropriate housing unit in the private market.<sup>4</sup>

Finally, Chapter 179 amended earlier eligibility criteria making an applicant who is a current illegal user — one who has used illegal drugs within the last twelve months — ineligible for housing. A history of alcohol or substance addiction, which constitutes a disability under antidiscrimination laws, no longer constitutes a disability for purposes of eligibility for housing programs.

The U.S. Congress and the Massachusetts legislature have been busy crafting legislation to address the issue of mixed populations in public housing for the elderly. Washington and Boston's reach, however, may exceed their grasp; on the local level, the intent of lawmakers can be subverted by street-level bureaucrats. Unanticipated reality at street level can often intrude in the implementation of public policy developed in the relatively pristine legislative environment.

### ***Implementation Considerations***

The eventual impact of each new piece of legislation, for example, giving waiting list preference to a new group, the near-elderly over the younger disabled, designating buildings for use by one population exclusively, or supplying eligible persons with a voucher to secure housing in the private market, is cause for concern. Within the housing arena, each of these policies could further pit individual interests against community interests. Legislation, policies, and rules that have been designed to address the needs of people with disabilities, as well as the development and distribution of affordable housing, are interpreted and enforced by federal, state, and local governments. According to Thomas Dye, "The relationship between public policy and governmental institutions is very close. Strictly speaking, a policy does not become a public policy until it is adopted, implemented, and enforced by some governmental institution."<sup>5</sup> Although legislation, or rules, exist ostensibly to govern the administration of policies and resulting program, the rules operate within a political context and within an environment in which local actors have the opportunity to exercise discretion in their implementation.

Deborah Stone notes that rules are political by their very nature because they "include and exclude, unite and divide."<sup>6</sup> Rules accomplish this, according to Stone, by "defining different treatment or permissible activity for different people . . . placing people in different categories; those treated favorably by a rule share a common interest in preserving it, while those treated unfavorably share an interest in overturning it."<sup>7</sup>

Michael Lipsky refers to those who implement and enforce rules that have an impact on the mixed population as street-level bureaucrats. He defines them as "public service workers who interact directly with the citizens in the course of their jobs, and who have substantial discretion in the execution of their work."<sup>8</sup> Lipsky cautions that while those who occupy public service roles have the ability to exercise a great deal of discretion, they are not "unrestrained by rules, regulations, and directives from above, or by the norms and practices of their occupational group."<sup>9</sup>

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### **Bricks and Mortar versus Services**

Increasingly, the population of public housing for the elderly is changing. As more frail elderly tenants and a new population of younger disabled tenants present themselves, housing managers unwittingly, and sometimes unwillingly, are being placed in the role of service advocate. This responsibility is often beyond the ability and the expertise of the manager.<sup>10</sup> Stephen M. Golant summarized the new reality of the housing manager's role well.

In the past, the role of senior housing manager was primarily defined as that of landlord or property manager. Trained as landlords they had administrative responsibility for collecting rents; renting out vacant units; overseeing lease and contractual compliance; overseeing the maintenance of the buildings and grounds; supervising staff; preparing operation budgets; completing regulatory paperwork; developing residential policies and procedures; screening prospective tenants; handling complaints from tenants, families, and staff and responding to all emergencies. As new responsibilities emerge, housing managers must successfully integrate both the administrative and support functions into their job. In expanding their role, housing managers must establish reasonable boundaries between their responsibilities and those of other professionals serving elderly tenants.<sup>11</sup>

Moreover, in a climate where the emphasis has been on bricks and mortar, the new stress of assuming responsibility for identifying services, making referrals, and so on, further challenges the limits of local management capacity as well as state and local resources. With legislative changes, for example, the Federal Fair Housing Amendments and the Americans with Disabilities Act, managers feel that they are hampered even more in their ability to ask questions that could help them understand the nature of a person's disability. Lack of specific information about tenants, and the inability to assess tenant needs, puts managers in what they believe is an untenable situation. In a 1994 study conducted by the McCormack Institute, housing managers revealed a degree of distrust of service providers, particularly providers of mental health services.<sup>12</sup> Managers often were left with the impression that the provider makes guarantees of sticking with a client, remains visible through the application process, but disappears once housing has been secured; the manager is left to deal with a person whose needs may be well beyond the manager's ability to understand, much less meet.

### ***Public Housing: Deregulation and Diminishing Resources***

Coincidental with the changing tenant population, the ever-increasing frail elderly and younger persons with disabilities, public housing managers are operating in a time of diminishing resources and a renewed emphasis on deregulation. Nationally, more than 3,000 local government PHAs own and operate public housing, serving more than 1.2 million households. It is estimated that over 400,000 of them consist of the elderly who live in either family or elderly housing developments.<sup>13</sup> Of the total households served, 75 percent, or close to 900,000, are estimated to have incomes well below established poverty levels.<sup>14</sup>

Waiting lists nationally are at an all-time high, and the length of time spent on a waiting list continues to grow.<sup>15</sup> Over a two-year period, 1996 to 1998, the average waiting time for a public housing unit increased from ten to eleven months. While this may not seem like a significant difference, the average waiting time at the nation's largest public housing authorities increased from twenty-two to thirty-three months. In certain cities, the U.S. Department of Housing and Urban Development (HUD) estimates, it is possible to spend from five to eight years waiting for a public housing unit and as long as ten years waiting for a Section 8 voucher.<sup>16</sup> In his January 1999 State of the Union address, President Bill Clinton announced that funding would be allocated to support 100,000 new Section 8 vouchers nationally. This number represented a mere drop in the bucket when in Boston, for example, the number of families on the waiting list for a voucher is approaching 5,000 and in New York, the number of families waiting exceeds 200,000.<sup>17</sup>

In 1996, HUD's Office of Policy Development and Research conducted an analysis of

how the Baltimore Housing Authority would fare in a more competitive housing market. While HUD noted that “changes of potentially historic proportion are coming to the nation’s public housing program . . . the precise forms of these changes are not entirely known.” What is known, according to HUD, follows.

For most Housing Agencies, there will be less Federal regulation as well as fewer Federal subsidy dollars than in the past, and there will be more local discretion, responsibility, and license to decide whom to serve and how best to serve them. As the program changes, local conditions would likely eclipse Federal regulations as the basis for HA decisions . . . HAs will need to be more responsive to, and knowledgeable about the state of their local housing markets. They will need to analyze their housing stock, organizational practices, and markets to know what is viable to do, and what is not, if subsidies are reduced.<sup>18</sup>

HUD selected the Baltimore Housing Authority (BHA) as a study site to assess the potential impact of these yet to be determined changes. Throughout the assessment it was assumed that public housing had been changed to a tenant-assisted (voucher) market-based approach in which most federal regulations are eliminated and operating subsidies terminated. The housing authority would be expected to compete in the marketplace for residents and revenues. The study found that without a significant infusion of capital improvement funds, long-term modernization plans, based on projected new revenues, a reduction of the current housing inventory, a shift to a smaller and more decentralized operation, and a movement toward serving a more mixed-income clientele, the housing authority would be faced with:

- Public housing units generally renting at or below market level;
- Most current tenants likely remaining in their current public housing unit, rather than pursuing the tenant-assisted, market-based approach;
- Even with high rates of occupancy, operating costs likely exceeding rent revenues;
- Current modernization work generating only small increases in rent revenues, not enough to exceed operating costs.<sup>19</sup>

The situation for public housing authorities is worrisome. After years of neglecting capital improvements and, in some cases, management responsibility, public housing authorities must position themselves strategically for survival. Will some pursue solutions that direct resources toward razing developments? Will they build, then, on the same sites, fewer units to be marketed to a mixed-income population? Many believe that less dense, modernized developments are desirable, but will such a strategy result in the displacement of current residents and lengthen time on waiting lists? Without direct subsidies, and without additional vouchers, how will the most vulnerable find housing? And, if public housing authorities fail the poorest of the poor, who will fill the gap?

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### **Conflict and Ambiguity**

In case of fire evacuate the building.

Do not use stairways.

Do not use elevator.<sup>20</sup>

As simple declarative statements, laws and policies tend to be vague. Local agencies step into the interpretation gap, feeling free to translate the enabling legislation into practice.<sup>21</sup>



Thus, the implementation of public housing policies and programs at the local level has been left to housing authorities. Jon Pynoos argues, "The federal government could not formulate one set of rules that would apply to the diverse conditions in the over 2,400 agencies that ran public housing programs."<sup>22</sup> Housing authorities operate within organizational and political structures distinct to the locale. Within them, staff members are assigned the responsibility for carrying out program goals; as Martha Derthick reminds us, the needs and abilities of local staff seldom are considered by those making policy.

Persons who presumably would give painstaking attention to instruction on how to use a pasta machine or a piece of video equipment make major policy decisions with virtually no thought to whether a complex organization of human beings can reasonably be expected to execute their commands. The difference lies in the fact that organizations of human beings, unlike mechanical or electrical devices, are thought to be infinitely pliable. It is of course true that people are more pliable than mechanical or electrical devices — but they are also less predictable and therefore require a greater effort to understand.<sup>23</sup>

Derthick's observations of one public agency ring true for most others. Certainly, within the public housing arena, it would appear that laws are crafted and policies are handed down to local housing authorities (LHAs) with no regard for organizational capacity, nor for the roles of those who work within the organization. Additionally, conflicting and ambiguous goals within vague laws and policies further muddy the waters.<sup>24</sup> Conflicting and ambiguous goals can also translate into unclear or conflicting role expectations. For managers, implementing public policy regarding mixed populations, conflict and ambiguity abound.

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## Roles and Goals

Conflicting and ambiguous goals frustrate defining the purpose of elderly housing as well. Is the goal to provide shelter or shelter plus care? A simple answer, free from conflict, might be to provide a roof over a "deserving" elder's head. But a simple answer is elusive, especially as non-elderly disabled persons moved into elderly housing, elderly tenants in residence grew older, with both populations presenting new, mutually contested goals of their own. If the goals of a program change, one might anticipate that the roles of the stakeholders would also change. This is not typical of housing managers, many of whom view their primary role as landlord and profess that they are not equipped to address the changing needs in elderly housing. It may be difficult to know whether their concern stems from their own limitations or from a social construct that views one population as more deserving of housing than another.

The larger issue of needs — who determines which needs shall be met and how — presents a true public policy dilemma. As noted by Lipsky, "The impulse to provide fully, openly, and responsively for citizens' service needs exists alongside the need to restrict, control, and rationalize service inadequacies or limitations."<sup>25</sup> Needs most often are determined within a political context; although a majority of people believe that society should help those in need; according to Stone, "An intense conflict [exists] over how to distinguish need from desire. Those needs that a community recognizes as being important, worthwhile, and always controversial, could be characterized as public needs."<sup>26</sup>

While conflicting and ambiguous goals contribute to implementation problems for public managers, so does the tendency, common within a political environment, to diffuse



responsibility. Efforts to address the needs of individuals seeking services create a tenuous balance with the interests of the general public, who may not currently have the same need but, through the political process, can influence how needs will be met. In a perfect world, policymakers would demonstrate the political will to confront a public need, for instance, that of universal access to safe, decent, affordable housing. However, the present system of addressing needs tends to fix blame, usually on unwitting bureaucracies, rather than fix problems. The larger issue of how a society establishes priorities goes unexamined, the process unchallenged. Lipsky points out that the tension created in the delivery of services to meet a public need is beyond the usual cost benefit analysis.

It is critical to reassure the mass public that their elemental needs will be taken care of if they are not met privately and to rationalize service inadequacies by deflecting responsibility away from government. Through street-level bureaucracies the society organizes the control, restriction, and maintenance of relatively powerless groups. Antagonism is directed toward the agents of social services and control and away from the political forces that ultimately account for the distribution of social and material values. Thus the American system of service delivery and control is shaped by the aspirations of the population and by the requirements of the larger political and social system.<sup>27</sup>

Public desires, shaped within political and social systems, have contributed to the crafting of housing laws and policies fraught with conflicting goals. Some, like the goals articulated in the National Housing Act (NHA) of 1949, were magnanimous. Although laudable in its intent that all Americans have access to safe, decent, affordable housing, the NHA's implementation provisions were not addressed and resources were not forthcoming. Goal attainment, in this case, was left to the discretion of state and local officials and the private market. While essential to ending one set of serious problems, deinstitutionalization, in the absence of provisions to provide community care, gave rise to another. Among its many provisions, the Americans with Disabilities Act requires reasonable accommodation; however, much of the discretion concerning the test of reasonableness is left for the accommodating provider. Just as there can be conflicting goals *within* a law or policy, the potential exists for conflict *between* laws and policies that may be implemented within the same arena. For example, conflict is inherent in implementing both the FHAA and Title VI; whereas the FHAA stipulates that persons with disabilities are not to be denied access to housing, Title VI, although providing alternatives, can limit choice, and ultimately access.

Competing and conflicting goals may have the effect of pitting the needs of the client against the goals of the organization. Housing managers wish to serve as many people as facilities can accommodate; they tend to see applicants and residents as individuals, attempting to manage cases individually. Policymakers, however, must view people as demographic groups, and the product of their deliberations is targeted toward entire cohorts. In the former instance the client is the applicant, the organization the local housing authority; in the latter, the LHA's role is flip-flopped, with the authority as the client and the relevant legislature playing the role of organization.

For managers, the experience of conflict is palpable, both in the extent to which they feel the inherent conflicts and in the extent to which that conflict comes to bear on a manager's effectiveness in implementing housing policies and administering housing programs. For example, managers may argue that an apartment occupied by a non-elderly disabled tenant is essentially unavailable for the next thirty years. However, the same could be said for an elderly tenant's apartment. One manager interviewed during a 1994

McCormack Institute study of mixed populations told of an elderly couple, husband and wife in their early nineties, who had moved into an apartment when both were sixty-two. Comments concerning younger tenants taking a unit “off-line” or out of the inventory reveal both a conflict and perhaps a hidden bias that could influence a manager’s discretion in filling a unit. Conflict may also emerge from differences within peer or reference groups, some managers believing that with the right balance of services the mix can work; while others are emphatic that under no circumstance could it work.<sup>28</sup>

Table 1 provides an overview of several dominant and conflicting observations made by housing managers concerning tenant needs and concerns as well as program goals and management roles. Observations in column 1 reflect some of the issues that are of concern to housing managers. An opposite set of conflicting, if not contradictory observations, detailed in column 2, were made by the same group.

Shifting public sentiment and the redefining of public needs have resulted in new laws and changing housing policies. It is not uncommon for housing managers to express a degree of frustration with state and federal bureaucracies; a source of that frustration is often identified as the lack of clearly articulated rules. Despite these frustrations (or, perhaps, because of them) local housing authorities have pursued remedies to the mixed population dilemma which have resulted in equally vague legislative solutions. Conflict and ambiguity emerges as various pieces of legislation have been implemented; some of these are identified in Table 2.

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## **Conflicting and Ambiguous Roles:**

### **Manager or Service Provider?**

Housing managers identify their primary role as that of landlord, yet most acknowledge that both the elderly and the non-elderly disabled populations require services to support a successful tenancy. When responding to a conflict, most take steps to identify a service need rather than pursue eviction. In many instances, managers may feel that they are stepping from their clearly understood role into another, somewhat ambiguous role, which is in conflict with the “landlord” role. While the elderly have been identified by many as the *entitled* beneficiary to elderly public housing, managers acknowledge that policies crafted and actions taken have let both populations down. With little doubt, in times of trouble or in an effort to stave off trouble, managers look first to residents’ families. Unfortunately in these cases, family structures are unreliable. The very elderly, living alone, may have outlived their families. Family members of a younger disabled person may have little involvement in that person’s life. Thus, despite their own misgivings, many managers assume, by default, duties that may once have been performed by family.

Mental health issues among the non-elderly population are often cited as a serious concern. Others recognize that mental health is also a serious issue for the elderly; as recorded in the literature, as the population ages, dementia emerges as a serious concern. Whether the cause is mental illness or dementia, the reduced capacity of young or old to process information and live up to the obligations of their lease can lead to behavior that violates the lease, providing grounds for eviction. Once again the unwilling manager is thrust into conflicting roles. Does he or she exercise management’s right to evict or don the less comfortable mantle of advocate and provider? A similar conflict exists concerning alcohol and substance abuse. Typically, while managers are equally divided on the gravity of alcohol abuse among the elderly, they are clear in their opinion that alcohol abuse is an issue for the non-elderly. Substance abuse, many feel, is an issue among the

Table 1

**Conflicting Need, Goals, and Roles**

**Column 1: Needs, Goals, and Roles**

**Column 2: Conflicting Observation**

Services are necessary to make the mix work.

The manager's primary role is landlord, not service provider.

Mental health and alcohol and substance abuse are all considered problem areas.

Managers acknowledge the problems but report limited training in these areas.

Conditions of the property or properties have an impact on the morale of tenants and contribute to overall feelings of safety.

Properties are in need of repairs but resources are inadequate or nonexistent.

Identification of the buildings as elderly housing has contributed to the current problem.

Housing authorities may have the option of designating buildings and floors for the exclusive use of one population.

Family involvement is important to supporting a successful tenancy.

Family involvement is limited and in many cases nonexistent.

Conflicts between the elderly and the non-elderly are significant and ongoing.

Many managers seek help from social services, or family, rather than pursuing eviction. Preserving tenancy takes precedent over eliminating conflict.

Age difference is the greatest problem.

Psychiatric issues among the non-elderly are the greatest problem.

Managers believe that safety is a big issue for the elderly.

Sixty percent of the managers who responded to questions concerning safety believe that their elderly tenants feel fairly safe; 31 percent believe that they feel very safe.

Managers believe that the elderly are fearful.

However, 91 percent of the tenants who responded to the 1994 McCormack Institute survey indicated they felt safe; 81 percent of those respondents were elderly.

There is strong sentiment among managers that the elderly should not have to live as they do and that the mix is bad for both groups of tenants.

However, 90 percent of the tenants who responded to the 1994 McCormack Institute survey reported that they liked where they lived; 81 percent of those respondents were elderly. The reasons were varied, but overall most expressed the sentiment that where they lived was "home," not housing.

The age difference is often reported as the greatest issue, that is, the old and young living together.

However, the populations within elderly developments are diverse: old-old, young-young, middle-young, old-disabled, and so forth.



Table 2

Conflict and Ambiguity within and between Legislation

Legislation Implementation Issue

Managers report that legislation is not fully understood.

Some managers report that they are quite familiar with the various laws.

Managers indicate that legislation often makes it more difficult to do their job.

The Fair Housing Amendments Act, as reported by managers, has had a negative effect on elderly housing. (This sentiment is shared by others, such as NAHRO.)

The Americans with Disabilities Act, according to managers, restricts their ability to screen applicants, namely, non-elderly disabled tenants, and manage properties.

According to the legislation, designation plans under Title VI require a service component.

The FHAA and ADA expanded eligibility for the non-elderly disabled.

Expanding eligibility criteria for the non-elderly disabled, coupled with issues that may result from tenants aging in place, has resulted in an increase in the numbers and variety of tenants' service needs.

Policies of deinstitutionalization, facility consolidation, and hospital downsizing, despite the absence of services and housing, had among their objectives reintegration of persons with disabilities into the communities or least restrictive settings.

Conflicting Perspective

However, most managers also report that, to varying degrees, they are implementing legislation.

However, some of these same managers indicate that they are not implementing or complying fully.

However, managers and housing authorities also propose solutions that would likely require some legislative action; further, legislative remedies such as Title VI have been aggressively pursued by organizations that represent local housing authorities.

However, the majority of survey respondents indicated that for the most part, the FHAA has been an effective piece of legislation for improving the housing situation of the elderly.

However, many managers indicate that for the most part, the ADA has been an effective piece of legislation for improving the housing situation of the elderly.

However, managers indicate that their primary role is to provide housing, not services.

Title VI and Chapter 179 place limits on eligibility for the non-elderly disabled.

Despite the increased need for services, and the numbers of managers who indicate that, for many, services are necessary to support successful tenancy, most managers continue to identify their primary role as landlord, not service provider.

Title VI allows for segregation of buildings for the exclusive use of a designated population.

younger population and worth watching among the elderly. However, managers also report that among the elderly there are concerns regarding misuse of prescription medications. Clearly, these issues present a service need. Again the questions: Who provides the service? Who is responsible?

A more subtle question hides in the dynamics of demographics. Policymakers see two distinct groups, each with a range of needs. Frequently, the problems are neatly ascribed to differences in age and lifestyle between the two groups. But what line divides the populations? As the younger disabled residents age in housing considered reserved for the elderly, attributing problems to age differences becomes less legitimate. Ultimately, the non-disabled elderly become disabled elderly, the non-elderly disabled join them as disabled elderly, and new, younger non-elderly disabled move into "housing for the elderly." For policymakers and housing managers, the present conflict and ambiguity may be rudimentary compared to what is yet to come.

Safety emerges as another theme. While housing managers indicate that elderly tenants worry a great deal about safety, very few managers report that *their* tenants, regardless of age, feel unsafe. Tenants of elderly housing surveyed by the McCormack Institute reported that most felt safe; during interviews, most housing managers asserted that *their* properties *are* safe. One wonders then, From whence comes this threat to safety? In much of the heated debate surrounding mixed populations, frightening behavior and awful crimes have been attributed to non-elderly tenants, allowing fear to become an additional wedge to exclude younger persons from the housing. Sadly, the issue of safety extends beyond elderly housing. Witness the tragedies of violence in schools once considered a safe haven for children. Should public schools follow the lead of public housing and move to segment or create alternative educational structures for students with disabilities?

Defining the problem becomes tangled in a diversity of perspectives. Stakeholders tend to see the issue through the prism of their specific viewpoint, developing solutions weighted toward their respective interest group. However, the managers of public housing are in the trenches; it is from those trenches that the most revealing, most trenchant, and most poignant thoughts are heard.

Those on the front lines, the managers, do not dispute the need for public housing among people with disabilities; nor do they deny that society has an obligation to people with disabilities. In spite of strong feelings regarding the propriety of mixing younger persons with disabilities and the elderly, managers continue to work hard to preserve tenancies, even those of the most obstinate residents. Eviction is considered an unfortunate last resort. But the best efforts of managers to make the mix work may suffer from their restricted role as public housing property manager; despite their best intentions, the managers must also act on behalf of other interested parties, discussed in greater detail below.

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### **Conflicting and Ambiguous Roles: Manager or Advocate?**

Advocacy roles may not be compatible with the organizational point of view of a housing authority or its funding sources. To be an advocate, Lipsky maintains, one must act on behalf of an individual or collection of individuals. Within the mixed-populations dilemma, advocate is one of the more difficult roles that housing managers have assumed, if not directly, then through the Massachusetts chapter of the National Association of

Housing Rehabilitation Officials (Mass. NAHRO), a housing authority trade association. Mass. NAHRO's public posture could be interpreted as advocating for the needs of the elderly, a popular constituency. Mass. NAHRO leaves the advocacy work for the non-elderly to disability organizations and advocates, perhaps losing an opportunity to join and advocate collectively concerning issues of affordable housing. While advocacy may be incompatible with controlling clients, conversely, through its restricted advocacy, Mass. NAHRO might yet exercise the ultimate control, limiting the organization's chosen population access to a public resource.

Further illuminating the self-imposed restriction on their role is the managers' identification with Mass. NAHRO as a primary peer reference group. For managers of public elderly housing, peers are colleagues and fellow workers who understand the pressures of the job, appreciate the complexities that exist in working with a mixed population, and empathize with each other. Although other housing advocacy groups operate in Massachusetts, some with identical interests, but not limited to Mass. NAHRO's agenda, fewer managers belong to other housing associations with representation beyond the traditional housing/landlord interest group. For instance, the Massachusetts Citizens Housing and Planning Association (CHAPA) advocates for a housing strategy that includes policies and legislation which support local housing authorities; and housing authorities are represented on CHAPA's board. CHAPA, however, also counts among its members academics, community-based organizations, and both nonprofit and for-profit housing developers. While CHAPA's agenda may be inclusive of Mass. NAHRO's interests, Mass. NAHRO does not necessarily support the broader agenda of CHAPA. CHAPA represents housing issues; Mass. NAHRO represents housing authorities, thus the scarcity of public housing managers among CHAPA's membership. This is consistent with the managers' limitation on their role in the mixed-populations issue.

Those with whom managers choose to associate is more than an inside-the-industry issue. To a large extent, the public's attitude is shaped by individual experience with public housing in local neighborhoods. Unless directly affected, the public's expectations are likely to be limited to a general sense that decent housing for the poor should be provided; although the "not in my back yard (NIMBY)" phenomenon can come into play, it is not usually connected with housing for the elderly. If managers of public housing empower their trade association to speak for them at the policy level, those statements become the managers' de facto public policy statements. Thus, a passive membership in a trade association can result in a public posture, or public perception, which may signal that public housing managers do not support public housing for non-elderly people with disabilities. Goal orientation within peer groups may also revolve around problem-solving strategies that focus on ways to reduce work pressures. If this is true, one might argue that efforts to limit the numbers of younger disabled, separating the populations, et cetera, may alleviate certain housing management pressures while doing little to solve the housing problems faced by both populations. While housing managers interact with them, tenants would not be among the managers' primary reference group.<sup>29</sup> Tenants are an important group in defining managers' roles, for instance, performing service and doing advocacy work, but they are not considered by management to know much about the world of housing, the difficulties faced by management, and what managers must do to make their facilities work.



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## **Other Factors That Influence Implementation**

Conflicting goals, roles in flux, and changing laws and policies all reverberate through implementation. Further, "third party sponsors" may intrude, advocating for applicants or current tenants who may be overwhelmed by complicated written policies and rules that managers endeavor to implement.<sup>30</sup> These third parties include social service agencies, politicians, and board members.<sup>31</sup> A reciprocal relationship exists between housing managers and third parties. For example, social service agencies trying to locate housing for their clients depend on the good will of housing professionals. Housing managers, in spite of their inherent role conflict, turn to the service agencies when tenants run into difficulty. Managers often express great frustration concerning the role of service agencies; from the managers' perspective, some agencies consider their work complete when they have secured housing for a client. The social service agency disappears once the client becomes a tenant, and the case becomes a housing authority problem. On the other hand, agency workers who deal regularly with a local housing authority may come to be regarded as part of the same peer reference group, the workers becoming more closely identified with the housing managers than their mutual clients.<sup>32</sup>

Through control of resources or support of legislative initiatives, politicians have a special ability to exert influence over implementation. In some instances, the role of a politician is simply to demonstrate to a constituent that he or she has acted on the constituent's behalf, typically by making a phone call or sending a letter expressing an interest in the housing or employment need. This is a no-lose situation for the politician, who can claim success if the constituent's need is met or blame the housing authority if the need is unmet. As blame is transferred to the bureaucracy, the bureaucracy falls back on the rules and regulations. The housing authority needs the politician to support its political agenda, to protect the authority in the budget process, to ease the land acquisition process, to limit access to public housing by undesirables, to eliminate barriers to razing housing, and for passing new legislation that may enhance control of rental subsidies in the area or provide new management tools.

Each local housing authority is overseen by a board of directors, which is either appointed by the chief executive officer for the locality or elected to office. The board has decision-making power, sets policy, and in many cases influences staffing, all of which affects a manager's ability to implement. An executive director I interviewed dealt with an extremely political board with a tendency to micromanage. To limit some of the board's meddling, he negotiated the stipulation in his contract that, as executive director, he had the exclusive power to hire and fire staff, thus limiting the board's ability to exercise direct influence over personnel matters. That any executive director would be forced to negotiate such a basic responsibility reflects poorly on a board of directors. In a perfect world the board would have one employee, the executive director, who hires, fires, supervises, and evaluates all other staff. Anything less removes the "executive" from the title, as well as from the job.

Within the current political climate of devolution and decentralization it is likely that even more discretion will be shifted to the local level, therefore requiring a greater degree of professionalism in the field of housing management. Managers with the skill to exercise discretion in a way that does not limit access are more likely to succeed in that brave new world. As Pynoos suggests, a manager's success depends not only on his knowledge of the physical plant and getting tenants to pay rent on time, "but to skills of advocacy, tenant relations, community organizing, tenant development, and linkages to the sur-

rounding community.”<sup>33</sup> Presumably, the mixing of these populations will continue, so coherent discussions around vague goals such as building community may be difficult to arrange. While managers believe that with more detailed information concerning an applicant’s or tenant’s background and disability, they may be better equipped to make decisions about how to place this person, it may be unrealistic to believe that policies which would allow discretion could be developed consistently. These may be clinical and social decisions that managers are neither qualified nor prepared to make in a nondiscriminatory fashion.

While many housing managers indicate that they have participated in limited training concerning issues within the developments they manage, Lipsky contends that for many street-level bureaucrats, on-the-job training is likely to be more effective than classroom learning. “Worker training is less important for practice than the nature of working conditions themselves. Without a supportive network of working peer relationships, training to improve the capacity of workers is likely to wash out under the pressure of the work context.”<sup>34</sup>

The aggregate profile of housing managers reveals differences in their backgrounds and orientations. Prior experience and education may not be a statistically significant predictor of whether a manager understands or implements legislation or how she or he may feel about the mix itself. But prior personal or deliberate professional experience with disability or aging may help raise awareness and sensitivity to the special needs of some residents. In these cases, managers are more likely to believe that given the correct supports, the problems are not insurmountable.

Examination of the characteristics of respondents in light of Pynoos’s suggestion that to be successful, housing managers must broaden their skill set indicates that they would benefit from extensive training or have greater incentives to move from their primary role of landlord into a new mode of operation. The model for training becomes important as well, if we assume that Lipsky is correct in his assertion that on-the-job training for this group is better received and may have a more lasting impact. This could explain why management participation at non-property-management-related training is typically low. The value of learning management of the physical aspects of a property may be apparent; it is obvious that physical plant management is tied to achieving career goals and increased opportunities within the property management field.

The difficulties in elderly public housing, for instance, limited resources and absence of services, are further complicated by vague policies and rules. Such ambivalence creates ample opportunity for conflicting interpretations and inequitable implementation of programs. One must also acknowledge the influence of third parties as a piece of the political landscape.

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## Summary of the Issues

The elderly public housing inventory was never designed to house large numbers of younger people with mental illness. The “handicapped” designation that accompanies the title elderly/handicapped housing was meant to serve a very small number of physically handicapped younger people who needed features like elevators, wheel-chairs-accessible apartments, grab bars, et cetera. For advocates to insist that the intent of the original legislation was to facilitate the downsizing and closing of state mental hospitals is ludicrous. While the deinstitutionalization concept is a good one, in order to work properly it must include money and housing search assistance for the clients and a well-funded follow-up program of a permanent nature.<sup>35</sup>

This comment illustrates the perspective that many who work in housing management share. While elderly housing was not considered part of the long-term plan concerning hospital downsizing, the 1988 Federal Fair Housing Amendments Act, making certain that persons with mental illness were not excluded from housing accessible to people with disabilities, may have been an all too common legislative afterthought. After several years of downsizing and consolidation, and little in the way of community care and adequate housing, public housing for the elderly was pursued as a viable option for housing this population. Attempts to simplify the issue of mixing elderly and younger persons with disabilities in the same residence can be found in observations that cast the problem as one of threats and fear or irreconcilable lifestyle differences and others that attribute it to managers' preferring to house one kind of tenant over another. Although one cannot hang on to these reasons, the statements cannot simply be dismissed. The fact is that all these issues come into play. It is true that there are problems within many public housing developments. Deferred maintenance has contributed to broader physical problems within the structures. As elderly tenants enjoy a longer life, once-active senior citizens are aging in place, becoming more frail and less independent; to maintain and maximize their independence, the non-elderly disabled tenants must cobble together services inside a system characterized as unhelpful and deficient. Collectively, these populations hoped for more but settled for less.

Among the ranks of elderly tenants are the dwindling members of the World War II generation; Tom Brokaw's *Greatest Generation* came of age in a time when elders appeared to be treated with greater respect and family systems remained intact.<sup>36</sup> Entitlement programs like Social Security and Medicare, along with the availability of affordable public housing for the elderly, allowed society to indulge in the comfortable notion that one's "golden years" would be honored and economically secure. Non-elderly disabled tenants represent a group that is not only diverse in customary demographics but further diversified by their disabilities as well as their abilities. This group includes the extremely able, mobility-impaired individuals who, having fought long and hard for independence, moved out of nursing homes and hospitals into communities only to be greeted by a less-than-enthusiastic welcome. Among the population of people with disabilities are some who, as a result of the nature and extent of their disability, for instance, persons with serious mental illness, may be less able but no less deserving. Many of the latter group gained their "independence" because society could no longer ignore the abysmal conditions in institutions established to provide care and rehabilitation. With raised expectations and a sense of what is possible, the elderly and the non-elderly disabled found themselves in the same economic tier, forced into association by poverty and competing for the same housing. Uneasy neighbors, indeed.

In the middle of this awkward living arrangement stand the public housing managers. Trained and certified as professional property managers, they are charged with managing the deteriorating buildings in their charge and the impact of public disinvestment on the morale of the community, staff, and residents alike. Although the managers literally have the keys to open and close doors for those seeking shelter, they do so in a public-sector industry that has long been maligned and underfunded. In Massachusetts, where the managers are the front line in 250 communities, they are expected to make order out of chaos, to strike a balance between vague legislation, conflicting policies, waffling politics, and competing values in their locales. Some managers come to the job well rounded, with skills and experience that equip them to tackle many complex issues; others have little education or experience outside of housing. They may know bricks and mortar very



well, but less concrete, less tangible issues, like aging, disability, and poverty sometimes confound them, especially in the political environment in which they work.

While this article does not focus on caregiving issues and practices, the stress that exists within a family trying to provide care to an aging, frail relative or a family member with a chronic disability is not difficult to discern. Nearby family might have contact or be welcomed by a less able family member. But to shoulder caregiving responsibilities on top of other family obligations, work commitments, economic pressures, geographical distances, and uncertainty about the level of care needed or available services can be overwhelming for even the best intentioned, most loving family member. Differing levels of support services are available for the elderly and the non-elderly disabled; these relationships with the service providers are not always smooth, services are inconsistent, and in some areas access is further constrained by a lack of transportation. The absence of a centralized service system can discourage those in need of services and their advocates from pursuing support; determinations are made on the basis of whether the energy spent trying to access services is worth the effort. Housing authorities feel that they must contend not only with being the “housing of last resort,” often an unfair rap, but having to act as de facto families, nursing homes, and halfway houses. It could get worse. As a result of more recent legislation, Title VI, housing authorities may possibly be forced to assume another new identity: mini-institution.

One cannot overlook the role of the community in trying to make sense of this issue. Community includes politicians, policymakers, and the public at large, all of whom play an important role in the shaping of policies and the administration of programs. According to Lipsky, “The extent to which communities are indifferent to the nature of bureaucratic policy or fail to express their view in politically salient ways, street-level bureaucrats will perform with internally generated objectives. The stronger the community sentiment the more street-level bureaucrats will respond to community orientation; the more divergent are community opinions the more conflict for the street-level bureaucrats.”<sup>37</sup> If, as some housing managers believe, the FHAA was crafted in response to the housing crisis accelerated by policies of deinstitutionalization and diversion, or if it simply has been interpreted by disability advocates as such, then its vague intent has done considerable harm.

It is unlikely that there will ever be an effective way to restrict local discretion exercised by managers. Restricting discretion at the local level may not always be desirable; some local discretion probably serves tenants and applicants well. The issue is more of ensuring consistency and equity in how decisions are made and how they are implemented. If there is no way around discretion, there should at least be an emphasis on enhancing the professionalism and the professional capacity within the ranks of those who occupy street-level bureaucrat positions. Strategies here might include establishing a minimum set of qualifications for managers, reviewing the salary and benefits structure to attract and retain managers who meet and exceed these standards, expanding and diversifying professional development opportunities, and identifying meaningful systems to evaluate performance, including mechanisms for rewards and sanctions, to name a few.

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## **Recommendations**

### ***Revisit Enabling Legislation***

- The enabling legislation for public housing authorities was drafted more than sixty years ago. It is time to take a second look. Modifications to

local housing authority (LHA) organizational and governance structures are long overdue. As it stands, local housing authorities (LHAs) are units of government; they might be more effective and accountable to their communities if they functioned like community-based, nonprofit organizations (CBOs). Such a structure would allow for movement away from a board of commissioners, which is either appointed by the chief elected official or elected to office and toward a structure that might be more representative of the community and its concerns. Diversity within the board structure could help broaden the managers' traditional peer reference group.

- Changes to the board design must be accompanied by board training and orientation. The effective board must understand its roles and responsibilities. A knowledgeable board can provide a healthy balance to management discretion. The board would be charged with working closely with the executive director and manager to establish goals and performance measures against which the manager will be evaluated. Depending on the size of the organization and his role, the executive director would then conduct a similar process for LHA management staff. This process should build in measurable goals or steps taken to work successfully with the changing needs of the tenant population, training to be pursued, and so on. In all cases goals should be linked to rewards and corrective action plans as necessary.
- A new organizational structure would allow qualified managers to be more flexible and responsive in helping to address a community's affordable housing needs. In the absence of such a restructuring and a revisiting of the mission and mandate, housing authorities may be destined to limp along as outmoded and ineffective in the delivery of affordable housing. The continued direction of housing cannot be about preserving the sanctity of housing authorities and managers' preferred role; it must be about meeting need.

### ***Role Clarification***

- Roles must be clarified. This is not impossible and should not extend only to clarifying the role of management from the preferred to expected; consideration must be given the role, reporting, and funding relationships between the LHA and state and federal governments. Differing legislative rules and policy guidelines conditioned by funding source create unnecessary paperwork; reporting requirements often are duplicated, contradictory, and redundant, creating opportunities for confusion and wasting time that could be spent on productive work. It is unconscionable that a housing authority could have within its portfolio both deteriorating and well-maintained buildings, their respective conditions attributable to the source of their respective public funds.

### ***Education and Training***

- Public housing managers carry the credential Certified Property Manager. The curriculum should be updated and the certification retitled Certified Housing Manager, to reflect the knowledge that is required in

today's public housing. Until this changes, managers will continue to cling to preferred roles, since that will be what they know, and have difficulty accepting or responding to the expanded duties of advocate, mediator, and service provider. To maintain certification and to continue to emphasize the need for professionalism, housing managers, like other professionals, should be required to keep their certification current by completing a number of continuing education credits annually, with a percentage devoted to services, technology enhancement, and building and maintenance.

### ***Families and Services***

- Nancy Sheehan writes, "Tenants with limited or nonexistent social networks are vulnerable when changes in health, functional ability, or other stressful events occur. Vulnerable elderly include elderly without family and tenants who rely on a single caregiver. Because families are the single most important source of assistance older persons receive, tenants without families experience significant disruptions when their health declines or other losses occur."<sup>38</sup> Housing managers and service providers alike are challenged to find new strategies for engaging families. Expectations that dysfunctional family structures can be rebuilt are naive; however, if families were aware that housing managers are interested more often in pursuing tenancies, not evictions, families may be less fearful that involvement comes with a probable consequence of welcoming a troubled relative back into the home. Likewise, if families know more about resources and services that would help their family member, they may be less intimidated and more willing to become and stay involved.
- To help with the resource challenge, service providers and LHAs should make better use of technology. An on-line community-based resource directory containing information about services, eligibility criteria, contacts, and so forth, should be made available to managers, tenants, family members, advocates, and so on. An on-line dialogue between LHAs and service providers should not be hard to achieve through the creation of a list-serve or some other common, private-sector technique used to help solve shared problems. It could also function as one more way to broaden housing managements' peer reference groups.
- To a considerable degree, the problem in the mix is one of service adequacy. With or without housing, the elderly will need support services, and younger persons with disabilities, depending on the nature and severity of the disability, may require services to maintain independence. Certainly having a roof over one's head makes provision of service more manageable. Housing authorities cannot be expected to manage such responsibilities on their own. They must engage their counterparts in human and social services on the federal and state levels to pursue a commitment of responsiveness and true partnerships. Responding on a crisis by crisis basis is poor public policy.
- While housing agencies acknowledge that the populations they accommodate may require services, it is a misbegotten use of their resources



and expertise to replicate what should now be occurring in service systems. For example, efforts by HUD to lead programs targeted at homelessness among the mentally ill may be well intended, but many people with a mental illness must also be provided with services. Statistics show that without services, people with mental illness quickly and easily become unhoused. With the aging elderly population, housing authorities alone should not be providing skilled care or even assisted living. They must partner with service providers. Without aggressive collaboration and a clear sense of mission and goals, housing managers will continue to find themselves unequipped to manage an uncomfortable situation. Managers may not be thrilled with the idea of these two populations living together, but services can make an important difference. The very notion of housing authorities developing services is contradictory to the preferred management role of landlord. Continued efforts must also be made to help managers assume new roles, but one cannot lose sight of the important duties that they perform, within resource constraints, by assuring that properties are well managed and maintained.

- Service providers themselves, often struggling with inadequate resources, could be provided with free or low-cost space within a development, enabling them to service their clients while serving eligible housing authority tenants. Larger developments certainly could benefit from either an on-site service coordinator or an assistant manager for services. Smaller developments, many with part-time directors, need a similar level of service; even a small proportion of a part-time director's time spent on services causes other tasks to be deferred.

### *Legislation and Policy*

- Developing new laws and policies that articulate a solution grounded in segregating these populations is folly. Resources ultimately may be diverted to achieve command and control versus support and independence. For example, designation of a building to segregate younger tenants with a range of disabilities could quickly get out of hand. Witness problems that have occurred in other settings where there are concentrations of younger persons with limited exposure to independent living, such as college dormitories. Now envision that environment further complicated by the difficulties and challenges that often accompany a disability. Without a dramatic change in management's role, or an overhaul of the service system, the best that management may hope for over time is to impose order by adhering to strict lease enforcement and pursuit of eviction for problem tenants. This policy may be exacerbated if combined with unchecked management discretion. Less desirable or more difficult tenants might be directed to troubled buildings. Complaints from tenants might be treated with a lesser degree of urgency. Maintenance resources may be diverted to buildings that have a "better" clientele. While I present just a few of the more negative possibilities here, the backlash from segregation could set the independent living movement back years, causing serious damage to years of efforts to

reintegrate persons with disabilities into the community.

- It is also flawed public policy to allow access to those who may not have a physical disability to units that could help maximize the independence of a younger or older tenant with physical limitations. Among this group, for example, are persons who may have a mental illness or mental retardation or even a head injury. These tenants could do well in a scattered site, voucher-supported housing where services, as needed, follow the tenant. Assistance must be provided to tenants as they navigate the confusing world of the private rental market. Both the landlord and the tenant could succeed with continued access to services.

### *Client Centered versus Organization Centered*

- Many issues between these two populations — the elderly and the younger disabled — are rooted in a clash of lifestyles. Managers should employ strategies to minimize the tensions and ensure that all tenants know their respective rights and responsibilities. For example, each new tenant should receive a detailed explanation of the lease and an orientation that will help her or him understand the many different people and lifestyles that coexist in the building. Leases can be confusing documents filled with legalese. Continued emphasis should be placed on community building — creating informal opportunities for people to mix may help neighbors get to know one another. Housing management has a significant role to play in reducing tensions caused by differences in lifestyles, including, as necessary, stricter enforcement of lease provisions that could help reduce behaviors that interfere with another's peaceful enjoyment of the premises.

### *Funding*

- A commitment must be made to fulfill the promise of the Housing Act of 1949. It is unacceptable that the wealthiest nation in the world does not view housing as a national priority, refusing to commit the resources to ensure that all in need are sheltered. Adequate resources must be allocated to (1) ensure that deteriorating physical plants are improved and maintained; (2) provide sufficient resources so that vouchers provided to non-elderly disabled persons are sufficient to meet escalating private market rents; and (3) create and support an array of affordable housing options to meet the changing needs of elders as they age in place.

These recommendations are purposely limited. The potential for future research is limited only by the limits of creativity. The following suggestions concern important work that could further help with this issue.

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### **Suggestions for Further Research**

The impact of Title VI should be studied. Careful attention must be paid to the numbers of housing authorities designating portions of their housing portfolio for the exclusive use of one population over another, with particular emphasis on emerging trends pertaining to the potential for resegregating the non-elderly disabled in mini-institutional set-

tings.

Staff structures within the LHAs could also benefit from further examination. Are current staffing configurations, including backgrounds and qualifications, sufficient to meet the changing needs of the populations living within public housing? In smaller housing authorities, for example, many part-time directors double as property managers, overseeing and directing maintenance, dealing directly with almost all tenant-related and other issues. Consideration must be given to whether these staff are being asked to do too much with inadequate resources. Continual research and evaluation is also necessary to determine the need for on-site services as part of the permanent staffing structure.

A clear profile of tenants living in elderly housing and those on the waiting list should be developed. Who are they? What kinds of issues are they confronting as they age? What kinds of family support systems exist, and do housing managers have the information and the authorization to engage family if needed? What are the ongoing service needs, levels of independence, health considerations, et cetera? This information is essential to addressing changing needs systematically.

Efforts must be made to measure the true level of administrative burden, an unfunded mandate in its own right. Much has been said about the time managers and others spend mastering legislation, rules, and other subjects, and its impact on implementation. Careful analysis of federal, state, and local regulations, with consideration to areas of overlap, redundancy, and contradictions, would be helpful.

Finally, policymakers would do well to examine models of alternative community structures to better understand how they work and whether there are lessons that can be learned and applied in the development of future affordable housing options for both the elderly and the non-elderly disabled. ❀

*This article is largely drawn from my dissertation, "Who Deserves to Be Housed: A Study of the Effect of Legislation on the Tenants and Managers of Public Housing for the Elderly."*

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## Notes

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