COMMUNITIES BY DESIGN: CONTROVERSY OVER AN INCOME-MIXING PROPOSAL FOR BOSTON'S PUBLIC HOUSING

by

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ABSTRACT

The question of whom to house and what kind of communities to create in public housing is an on-going dilemma for policy makers. From the segregationist practices of the early days to the integrationist approach of the later years of public housing, strategies to deal with these questions are often formulated in the name of "the greater good" of the community. In a program such as public housing where race, income and class are central issues, such strategies are often highly controversial.

This thesis examines the nature of the controversy that was created by an income-mixing program proposed in 1983 by the Boston Housing Authority. The BHA proposed the "Broad Range of Incomes Program" as an economic integration strategy, arguing that it would create viable communities in its public housing developments. Because the proposed program limited access to public housing for the unemployed and those on welfare, it led to heated debates between the BHA and advocacy groups who argued that it would victimize those most in need of public housing. While the underlying issue was the question of who among the poor should live in public housing, the conflict was centered on a symbolic battle between the "good of the community" and the "rights of individuals."

The analysis in this thesis is not presented to prove whether income-mixing as a strategy is good or a bad. Instead, it will illustrate the nature of the controversy behind the conflicting views of the policy makers at the BHA and the advocacy groups. It will also investigate the reasons why the conflict developed, even though both sides were claiming to be acting in the best interests of the poor.

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INTRODUCTION

In 1983, the Boston Housing Authority (BHA) proposed a tenant selection strategy for its public housing developments called the "Broad Range of Incomes Program" which was designed to transform the BHA’s tenant mix: instead of being overwhelmingly poor and nonworking people, there was to be a 50/50 mix of the so-called "working poor" and unemployed welfare recipients. Since over 70% of BHA’s actual tenants and those on the waiting list at the time were welfare recipients, the new proposal would have given preference to working applicants over welfare recipients in for assignment of units in the public housing developments.

The BHA argued that the strategy would be in the best interest of the public housing program and its tenants in that, among other things, it would help build socially and economically viable communities in public housing. As a result of more working people living in public housing, the proponents argued that the unemployed would have more of a chance to find jobs and that more politically and socially empowered communities would be created. Several advocacy groups opposed the proposal arguing that it discriminated against the unemployed, women and welfare recipients, because it limited access on the basis of income.

Research Question

This thesis examines the nature of the controversy created by the BHA’s income-mixing proposal. The research question asks why policy makers at the
BHA and people working as advocates for the poor had conflicting views regarding the income mixing proposal, even though both were claiming to be acting in the best interest of the poor. Also, what was the nature of the controversy concerning the income-mixing proposal? In answering these question, the thesis argues that:

I) Historically, discriminatory practices based on race, class or income associated with Public Housing Authorities (PHAs) have made advocates skeptical about strategies initiated by policy makers at the BHA.

II) Contextually, the prevailing political and economic attitudes at the time of the proposal were unfair. The idea that welfare-dependents were to blame for remaining in poverty was prevalent in the Reagan administration. Benefits for the poor were cut drastically. While the administration restricted public housing as a "safety net" almost entirely for the very poor, its economic policy drastically reduced subsidized housing stock, thus increasing the numbers of homeless and poor people. Advocates felt that this increased poverty and homelessness demanded that public housing be reserved for the most needy. Policy makers at the BHA believed that during this time of diminishing political and economic support, the only way to preserve the public housing program would be to change its image through the income-mixing program it proposed. On the other hand, the proposal’s inherent discrimination against welfare recipients and the unemployed was understood by advocates as an extension of the Reagan administration’s attitude toward the poor.
III) While the underlying issue in the controversy was deciding whom among the poor should live in public housing, the nature of the controversy was centered on a symbolic battle between the "larger community need" verses the "rights and needs of certain groups" for housing. Framed\(^1\) from a "community need" perspective, the BHA's proposal led to the justification of an income-mixing strategy that limited public housing access to the unemployed and welfare recipients in the name of a great social good. As a result, advocates felt it was necessary to protect the rights of certain vulnerable groups such as welfare-dependents and the homeless. This led to a controversy focused on a battle between the conflicting frames of "community needs" and "individual group needs."

The two conflicting perspectives were shaped as much by the political and economic conditions of the time as they were by the public housing experience throughout its history. Between the Housing Act of 1937, which gave birth to the nationally funded public housing program in this country, and the early fifties, public housing was perceived as "transitional" housing for those who were considered middle-class but whose economic conditions

\(^1\) The definition of framing used in this thesis is one given by Martin Rein and Donald Schon. They give the following definition: "Framing is...a way of selecting, organizing, interpreting and making sense of a complex reality so as to provide guideposts for knowing, analyzing, persuading and acting. A frame is a perspective from which an amorphous, ill-defined problematic situation can be made sense of and acted upon." See Rein, Martin and Donald A. Schon. Frame-reflective policy discourse. Massachusetts Institute of Technology. Photocopy.
were temporarily affected due to circumstances beyond their immediate control.

In the fifties, public housing changed from being "transitional" housing to housing of "last resort" for many poor families displaced by slum clearance, a program supported by "public housers" in hopes of getting more sanitary housing for the poor. Many of these people were housed in large-scale high-rise public housing projects. While these projects were built to improve efficiency and sanitation, they were criticized by public housing advocates such as Catherine Bauer who saw them as an "...extreme form of paternalistic class-segregation built in the name of modern community planning."2

Skepticism and hostility toward public housing agencies grew as a result of their discriminatory practices. The civil rights movement, however, provided the vehicle through which advocates outside of governmental institutions could successfully challenge the practices of housing agencies.

By the seventies, the majority of tenants in public housing had become the very poor and those on welfare. Declining revenues from tenants and increasing operating costs had threatened the financial solvency of Public Housing Authorities (PHA's). Instead of raising the subsidy level, the law makers at the time found it more desirable to raise the incomes of public housing residents. The 1974 legislation, as a result, required Local Housing Authority's (LHA's) to

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establish "income conscious" tenant assignment criteria in order to prevent public housing from becoming occupied by the very poor.

Like many public housing developments in the country, Boston's public housing had reached a crisis stage by the end of the seventies. Bad management and a lack of municipal services as well as crime, unemployment and poverty had threatened the program. The BHA as a result was put under a court-appointed receivership by 1980. Convinced that many of the problems at Boston's public housing developments stemmed from the concentration of unemployed and very poor families away from the middle class, the BHA set out to change that situation through its proposed broad range of incomes program.

The thesis is divided into five parts:

Chapter One looks at the the historical chronology of the public housing program at the national and local levels.

Chapter Two presents the "Broad Range of Incomes Program" as proposed by the BHA and examines its implications for the tenant selection process as well as its anticipated impact on the tenant mix in BHA's developments at the time. This chapter also analyzes the institutional responses from the U.S. Department of Housing and Urban Development (HUD), the state's Executive Office of Community Development (EOCD) and the Mayor's Office. While HUD and EOCD approved the proposal, the mayor's rejection coupled with opposition by coalitions of advocacy groups, prevented the proposal from being implemented.

Chapter Three presents the arguments of the the BHA and the advocacy groups. This chapter looks at the rhetoric used to advance the conflicting views from both sides.
Chapter Four analyzes the controversy looking at the historical and contextual forces that informed the conflicting views as well as the symbolic nature of the controversy that developed. This chapter argues that because of the controversy’s symbolic nature, compromise became impossible. This chapter also suggests an alternate framing strategy in which a more workable and less controversial program could have been developed to achieve similar goals. It argues that if the proposal was framed primarily as an economic integration program to enable instead of deny access to the unemployed, then groups that came out against economic integration would have more likely been in support of it.
CHAPTER ONE:
PUBLIC HOUSING: THE HISTORICAL ECOLOGY

Although public housing has and continues to be associated with people in the lower end of the social and economic class stratum, it is a misnomer to assume that it has been a social program established for the sole purpose of serving those most in need of housing. At different times in its history as a federally funded program, it has been governed by different rules, both at the national and local levels, for different purposes. While these rules were often formulated in the name of a greater good for those living in public housing or society at large, the primary purposes have often been to stimulate the interests of the dominant political and/or economic group that controlled the resources for public housing. As a result, those politically and economically weak have been victimized at different times by rules or strategies established through the public housing program in the name of creating better communities. This has led to skepticism toward the practices of housing agencies and has created the need for increased involvement of advocacy groups for the housing needs of certain people such as racial minorities, the homeless, people on welfare and single mothers.

This chapter gives an overview of the public housing program at the national and local levels. It traces the changing roles of the program since its establishment in the early 1930s looking at how it came about and who it housed at different times in its history. It will first examine the federal housing program in the last fifty years. At the local level, it will examine the
practices of the Boston Housing Authority from its establishment in 1935 to the
days of the receivership in the early 1980s.

The National Scene

In its early days, the public housing program was established to assist middle-class and working-class Americans who were temporarily affected by the Depression. Later, public housing became home for people displaced by slum clearance who were then housed in large scale, high-rise apartments, segregated from the rest of society. The civil rights movement challenged the discriminatory practices that were prevalent in the public housing program. As a result, public housing became a tool for economic and/or racial integration in order to give increased access to better services for those who were previously discriminated against. As the level of poverty and the number of people trapped in it grew throughout the seventies and eighties, public housing became housing of "last resort" for people on welfare, and people who, by virtue of their race or class, were discriminated against in the private housing market.

The Early Years

Between the early 1930s and the early 1950s, public housing was home for the so-called "submerged" middle class whose economic condition was affected by factors beyond their control, such as the Depression or war. It was considered "transitional" in that once the economic conditions of these tenants
were stabilized, they would leave public housing and move into private housing.

Housing as a national problem was first reflected in legislation in the early 1930s. Both the decline of housing production after World War I and the collapse of the market in 1929 shaped thinking about housing problems. Increasing numbers of workers who lost their jobs as a result of the Depression also lost their homes, and the ability to pay for decent affordable housing was shattered for many. At the time, two-thirds of American families were considered inadequately housed while one-third were considered to be living in substandard housing. Public housing advocates such as Catherine Bauer argued that public housing must be an essential supplement to private housing production, which would be needed even during economic abundance, because low-cost housing could not be maintained in the private market due to the cost of housing production.³

The country's dominant political and economic institutions were against public housing, claiming that it was unnecessary and contradictory to the American philosophy of "free enterprise." Despite evidence that demonstrated the inability of private industries to produce low-cost housing, opponents of public housing had insisted that housing ought to be provided by the private sector and not the government. Housing starts, for example, had continuously declined from 937,000 in 1925 to less than 100,000 in 1933. At the

same time, the nation's unemployment had reached 15 percent in 1931 and 25 percent by 1933.4

A statistical study conducted by Edith Elmer Wood had come to the same conclusion: that two-thirds of Americans would not be able to rent or purchase housing at a price that was profitable to the private industry. She concluded that without public assistance, a substantial number of Americans would never be able to afford decent housing. Despite this evidence, President Hoover and his legislators resisted the use of federal resources to establish housing for the poor.5

One particular group that felt the pinch was labor unions whose membership was affected by the Depression. Many union members became unable to pay for decent housing and most lost what housing they had. Catherine Bauer, a young housing activist in the 1930s, saw the potential in the political power of labor unions: their eminent interest in public housing and their potential political force in helping to build a counter movement to those opposed to public housing. She organized these groups into housing activists at the Labor Housing Conference in 1934, where she was able to sow the seeds of a powerful housing movement which transformed local labor groups into housing advocacy groups. These groups became an influential political force in the campaign for public housing, which eventually became the catalyst for establishing the first public housing act in 1937.

5 Cole, Mary S., pp. 7-9.
However, the strength of big business and its influence on a conservative Congress had left its mark on the first Housing Act.

In order to pass the bill it was necessary, or felt necessary, to confine the program to the construction of housing only for those who could not afford what private enterprise was willing and able to build. Yet in so far as we can speak of the potential tenants of public housing as at least an indirect pressure group, influence flowed not from the destitute, the descendants of the destitute, the children of Five Pointers, the Negro ghetto dwellers, or the abject poor; it flowed from the submerged and potential middle class. The ideal housing act, then, would be one which would accept the new poor and reject the old poor; it would shut the doors on those with the ability to get housing privately, but would not open the doors to people on the dole and likely to stay there.... These were precisely the provisions of the Federal Housing Act of 1937.6

The Middle Years

The proponents of urban renewal joined forces with the "public housers" to bring about the Housing Act of 1949. Title I of this Act established slum clearance programs which eventually displaced large numbers of poor residents from inner city communities. The Act gave public housing preference to those displacees who were poor and economically less mobile. Through the fifties and the sixties, large scale and highly segregated public housing developments were built to house these people.

While urban renewal was sold as a "greater good" for society in that it would improve the dismal living conditions of the urban poor by getting rid of unsanitary living conditions, it was clear from the beginning that urban renewal was not going to favor the poor. However, although public housing advocates such as Bauer were opposed to the concept of urban renewal in the

early thirties, public housing advocates in the 1940s believed that they could tie slum clearance to the production of low-income housing. Marc Weiss wrote, "Fortified by this logic, they [public housers] energetically supported urban renewal and helped lobby it through Congress and state and local legislative bodies."7

The "public housers", according to Weiss, became politically instrumental in passing the Housing Act of 1949, but due to the political and economic power of bankers and realtors, the Act did not succeed in creating "decent housing" for the poor. The effect of urban renewal was urban removal of communities of poor people from the inner cities without adequate relocation. Instead of creating low-income housing, urban renewal merely eliminated many of them from the inner cities.

As a result of the 1949 Act, many large-scale high-rise developments were built so that displaced families from the inner cities could live in "modern sanitary buildings." However, these developments had their critics who understood the actual effect and the sometimes deliberate intentions in creating such projects. Bauer wrote:

Public housing projects tend to be large and highly standardized in their design. Visually they may be no more monotonous than the typical suburban tract, but their density makes them seem much more institutional, like veterans' hospitals or old-fashioned orphan asylums....Any charity stigma that attaches to subsidized housing is thus reinforced. Each project proclaims, visually, that it serves the "lowest income group."8


8 Bauer, pp. 277-278.
Since their inception, these developments have had intrinsic problems, attributed not only to their location in the most undesirable areas, poor building design, and bad management, but also to the fact that they were becoming more like institutional buildings in which large numbers of poor people were concentrated. The large-scale housing projects built in the fifties, such as the Pruitt Igot in St. Louis, the Robert Taylor Homes in Chicago, or Colombia Point in Boston, did not help build any confidence in programs that housing agencies initiated in the name of the greater good of the community.

In evaluating large-scale public housing projects, Oscar Newman, in his book *Defensible Space*, echoed a sentiment similar to Bauer's when he stated that "Society may have contributed to the victimization of the project residents by setting off their dwellings, stigmatizing them with ugliness, saying with every status symbol available in the architectural language of our culture, that living here is falling short of the human state." 9

In supporting programs such as the urban renewal program, carried out as a greater community good, or in being associated with housing the poor in high-rise warehouses, the public housers in the late 1940s did not enhance their own reputation among those whom they were supposedly helping. Regarding their association with urban renewal, Mark Weiss wrote:

Poor people and minorities learned that they could not count on the paternalism of public housers to save them from the bulldozers.

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Eventually they rioted, organized, and won some rights and benefits that contributed to urban renewal's demise in the mid-1970s (only to be reincarnated as Community Development Block Grants and Urban Development Action Grants).  

_The Later Years_

In the sixties and the seventies, desegregation in public housing became the avowed goal of public housing agencies. The civil rights movement of the sixties raised optimism among tenants as well as advocates to work toward housing rights for the poor. A coalition of advocacy groups increased the demand to respect the civil rights of the poor as well as meet their shelter needs. The movement also challenged discriminatory practices of housing agencies at the local levels in which racial and income segregation was standard practice, as was discrimination against single mothers.

Integration came to be considered "the greater good" and efforts to accomplish it were made by local housing agencies. However, the effort to maintain economic and racial integration also meant that people had to be turned down for housing based on their race or income. Housing agencies, for example, had devised strategies to prevent the "tipping" effect in order to keep a certain community racially balanced. In places like New York's Starret City, such practices meant that black families were denied access to housing, while units remained vacant until white families were found to take them. Such practices were challenged by civil rights groups who believed that racial integration was not to be achieved at the expense of those who have been victims of discrimination in the segregationist approach of the past.

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10 Weiss, p. 255.
By the early 1980s, the overwhelming majority of public housing residents and those waiting to get in were very poor and on welfare. Homelessness reached a crisis stage by 1983. While the Reagan administration designated public housing almost solely for the very poor, its economic policy also drastically reduced subsidized housing stock. Policy makers in PHA's were faced with the dilemma of how to meet the financial burdens of the authorities in the face of declining resources and increasing numbers of poor people waiting to be placed in public housing. Facing the threat of financial insolvency and an increasingly poor tenant population, PHAs such as the Boston Housing Authority began to consider economic integration as a means to improve the socioeconomic conditions of the developments. Advocates for the poor, on the other hand, felt that increasing poverty and homelessness demanded that public housing be reserved for the most needy.

**The Boston Housing Authority**

The BHA was established in 1935 by the Massachusetts legislature and was one of the earliest local housing authorities to take advantage of the Housing Act of 1937. The residents of housing developments were almost all white, two-parent families, with the exception of the Lenox Street project,

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which was built in an all-black neighborhood. 13 These were mostly people who were considered stable working people with middle-class values who became temporarily poor due to the Depression.

Screening Tenants

Until the mid 1950s, reasons for applicant rejection included, according to Jon Pynoos, who studied the BHA in the 1970s, "unmarried couples, out-of-wedlock children, unsanitary housekeeping, and obnoxious conduct or behavior in connection with the processing of an application." 14 Maintaining stable working-class tenants and avoiding undesirable tenants were the primary objectives of the managers who conducted the tenant assignment process.

Political patronage was another endemic problem associated with BHA's tenant assignment. The structure of the BHA's governing system lent itself to political patronage: four members of the five-man governing board were appointed by the mayor and the fifth by the state. "The value of passing out board appointments to one's friends," according to Pynoos, "was evident in a political system where the mayor's election was based on a loyal following and where, as in Massachusetts, board members were well paid." 15


15 Ibid. p. 12.
Strict screening and political patronage, therefore, helped maintain stable working-class tenants. Those considered "undesirable" by the BHA staff and its policy makers were systematically kept out of public housing.

New Tenants

By the early fifties, as a result of the U.S. Housing Act of 1949, a new mix of tenants had changed the demographics of Boston's public housing developments. Provisions were made under this act for elderly persons and, most notably, preference was given to families displaced by slum clearance and very low-income people. In the name of creating a better living environment for these people, the "infamous monster projects" such as Columbia Point, Bromley Park, the Mission Hill Extension, and the South End's Cathedral Projects were created.16

While these developments were supposed to create better living environments for slum dwellers, the result was to the contrary. They soon became less than desirable living environments with a multitude of problems, like those facing many similar large-scale public housing developments nationwide. Only a decade after they were built, for example, Colombia Point and Bromley Park had already become the most problematic and, according to May Hipshman who conducted a study of the BHA in 1967, there was a correlation between project size and the problems associated, at least, with Colombia Point.17

16 Scobie, p. 35.
Segregating Tenants

Throughout the 1950s and early 1960s, segregation of projects by race became prevalent as increasingly poor and non-white tenants became the new settlers in Boston’s public housing. Economic growth and the extension of the federal mortgage program under Title II of the 1949 Act had enabled most of the middle-class or working-class whites to purchase their own homes. For the remaining whites who still needed public housing, the BHA staff implemented strategies for segregating them from the non-white developments.18

Segregation of tenants in the developments was not only based on race. According to Pynoos, people considered to be problematic by BHA standards were segregated from other public housing tenants and concentrated in certain projects. Citing a report from a January 29, 1963 Boston Globe, he stated that "in several projects the majority of children were fatherless and half the families were receiving some sort of welfare aid."19

The segregated developments were maintained with an implicit assumption that it would be for the benefit of those communities who lived in public housing. For example, blacks were segregated from whites with the assumption that blacks would want to live with blacks and whites would want to live with whites.

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18 Pynoos, p. 15.
19 Ibid.


Advocacy and Reform

In the sixties, increased numbers of tenant organizations and coalitions of advocacy groups banded together to challenge the discriminatory practices and highly restrictive rules for tenant selection. The civil rights movement provided the vehicle through which outside advocacy groups could effectively speak for the poor and lower class citizens. These groups help to establish reforms at the BHA.

The BHA’s practices in its public housing developments were challenged by several advocacy groups, civil right organizations, and newly formed tenant organizations. Spear-headed by the National Association for the Advancement of Colored People (NAACP) and the Congress on Racial Equality (CORE), civil right groups and tenant organization focused on the segregation practices of the BHA and pressured the city to make reforms within the authority. In 1963, pressured by this movement, Mayor Colins appointed Ellis Ash as new administrator to the BHA.

Under Ash, considered to be a progressive and reform minded administrator, the BHA, in agreement with CORE and NAACP, replaced most of the old rules for selecting tenants with more equitable and less restrictive rules.20 Many of the old exclusionary factors, such as those which kept out "unacceptable" tenants like out-of-wedlock children and unmarried couples, were scrapped. New rules were established by 1965.

The new exclusionary rules were primarily focused on factors that could undermine the safety of the public housing community. Excluded

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20 Hipshman, p. 25.
were applicants who had criminal records, or "whose [family] composition or behavior constitutes:

- A danger to the health, safety, morals of other tenants;
- A seriously adverse influence upon sound family and community life;
- A source of danger or damage to the property of the Authority;
- A source of danger or damage to the peace and comfort of other families;
- In any other sense, a nuisance." 21

While exclusionary rules focused on those who might pose danger to tenants and property, inclusionary criteria focused on income and need. In order to maintain adequate rent revenue, the new rule made a provision for income-mixing. Based on a $57 per month as a benchmark, which was the average "break even" monthly rent for the BHA in 1965, tenants were to be selected with a mix of incomes whose paying abilities were above and below the benchmark. To maintain the average rent revenue, the mix of tenants from the two income groups was determined by the mix required to maintain the average rent per month. 22 From the two income groups, next priority was given to those with the highest housing need. Housing need was determined by length of time an applicant had been without housing, or close to being without a home and whether applicants were in unsafe or overcrowded housing. 23

Among applicants with similar incomes and needs, priority was given to families with large numbers of children. Among families with equal

21 Ibid. p. 27.
22 Ibid.
23 Pynoos, p. 20.
numbers of children, veterans and people displaced by public action were given priority. When all factors were equal, the family who filed the earliest application was given priority.\(^2^4\)

While these fair and more objective rules were established in the sixties, rules did not necessarily translate into implementation. Since the authority was still governed by the five man board, four of whom were appointed by the mayor, political patronage, although not as much as in the past, still played a significant role. Furthermore, the staff at the lower level who carried out the actual tenant selection and assignment task were still maintained by the old guards. Describing the influence of political patronage on the tenant selection process, Ash stated:

The actual assignment of tenants to units, or who got what, was done in the Chairman's office. Vacancies did not go to Tenant Selection but to the Chairman. When one long-awaited project of 100 or so units was ready for occupancy, there followed hours upon hours of individual judgements as to who would get the units during which the wishes of the Mayor, Council members, certain legislators and each Authority member had to be satisfied. As a result, the project was not opened up for two months after it was ready despite the obvious need and the waiting list.\(^2^5\)

**Trouble Times and the Need for Receivership**

In 1969, under the so-called Brooke amendment, LHA's were required to restrict rent to be no more than 25% of tenants income. The 25% rent cap and increasingly poorer tenants as as well as continued mismanagement throughout the 1970s brought the BHA to a crisis stage. By the end of the seventies, it was in a state of collapse, facing a multitude

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\(^2^4\) Ibid.

\(^2^5\) Quoted Ibid. p. 21.
of problems that included high vacancy rate, deteriorating physical conditions of buildings, and high rates of crime and vandalism in the housing developments. More importantly, the economic conditions of the authority’s 60,000 tenants were in a continuous state of decline.

The BHA’s annual tenant income in 1980 was between $3,700 and $6,700, the lowest per capita income for housing authority tenants in the country. With part of its revenue for operating cost coming from rent, and tenant’s rent payment capped at 30% by this time, the situation had threatened the BHA’s financial solvency. In most of the developments, only 20 to 30 percent of tenants had jobs, while the rest were unemployed and received some form of welfare. Furthermore, increasing numbers of tenants became single parent families. By 1980, over 75 percent of BHA’s public housing developments were occupied by female headed families.

While the tenant situation had changed considerably, the authority’s management practices had continued to deteriorate. Citing incompetence and mismanagement on the part of BHA’s governing body, the authority was put under a court ordered receivership in 1979 and, in 1980, Lewis (Harry) Spence was appointed as the receiver.

Some of the authority’s primary objectives soon after the receivership was to maintain security at the housing developments and increase tenant screening as well as quick eviction of troublesome tenants. Security was improved through increased police protection. However, the quick eviction of troublesome tenants without due process brought into question the civil rights
issue. Another objective was to end the concentration of unemployed people by increasing the percentage of working families who were eligible for public housing through a new set of tenant selection criteria. To accomplish that objective, the Authority proposed to implement the "Broad Range of Incomes Program" as a strategy to transform the BHA's tenant mix from being overwhelmingly unemployed people to including an equal mix of working and welfare tenants.

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26 See Boston Housing Authority, a case prepared at the John F. Kennedy School of Government, Harvard University, by Esther Scott, 1983.
CHAPTER TWO:
THE BROAD RANGE OF INCOMES PROGRAM

This chapter presents the income-mixing program proposed by the BHA, the implications it would have had for the tenant selection process and its anticipated impact on BHA's mix of tenant populations in 1984. The chapter will also discuss the institutional responses from the federal and state housing agencies, in support of the proposal and responses from the mayor who rejected it.

Introduction

In 1983, the BHA proposed a tenant selection strategy based on income for admission to BHA housing. The program would have established, at each housing development, an equal mix of tenants whose household income was less than 25 percent of the area median, as defined by HUD, and tenants with incomes equal to or above 25 percent of the area median, up to the maximum allowable by HUD for public housing eligibility.27

Since federal law required local housing authorities to establish a broad range of incomes among tenants of public housing developments, the proposal received immediate approval from HUD. The state housing agency, EOCD, approved the proposal reluctantly, adding several conditions to assure that the proposal did not have adverse effects on the very poor. However, mounting

27 In 1984, for example, the upper limit for a family of four to be eligible for Boston's public housing was $17,700.
opposition from advocates for the poor and subsequent rejection by the mayor put an end to the proposal in 1984.

**Tenant Selection Process**

The tenant selection process established under this proposal used two income tiers from which families would be selected for assignment in the housing developments. As Table 1 indicates, families with incomes less than 25 percent of area median income, adjusted for family size, would be in Tier I and families with income equal or above 25 percent would be in Tier II. Most of Boston’s public housing tenants, almost 70 percent, and those on the waiting list at the time had incomes in Tier I. In order to accomplish the intended goal under the new proposal, more Tier II applicants and fewer Tier I applicants would have to be allowed into the public housing projects.
Incomes of Actual and Waiting List Tenants

While the income composition of BHA’s tenants might vary from one development to another, as a whole, the largest percentage of people living at or applying for each development had incomes below 25 percent of area median. Table 2 indicates that in some developments, such as Columbia Point, Fairmount and Gallivan Boulevard, applicants had significantly lower incomes than the actual tenants. However, at developments where applicants had higher incomes than actual tenants, such as Mission Hill or Franklin Hill, the difference was insignificant.

### Table 1

<table>
<thead>
<tr>
<th>Persons in Household</th>
<th>Tier I</th>
<th>Tier II</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>$0 - 5,400</td>
<td>$5,401 - 12,180</td>
</tr>
<tr>
<td>2</td>
<td>$0 - 6,150</td>
<td>$6,151 - 13,920</td>
</tr>
<tr>
<td>3</td>
<td>$0 - 6,950</td>
<td>$6,591 - 15,660</td>
</tr>
<tr>
<td>4</td>
<td>$0 - 7,700</td>
<td>$7,701 - 17,400</td>
</tr>
<tr>
<td>5</td>
<td>$0 - 8,200</td>
<td>$8,201 - 18,488</td>
</tr>
<tr>
<td>6</td>
<td>$0 - 8,650</td>
<td>$8,651 - 19,575</td>
</tr>
<tr>
<td>7</td>
<td>$0 - 9,150</td>
<td>$9,151 - 20,663</td>
</tr>
<tr>
<td>8</td>
<td>$0 - 9,650</td>
<td>$9,651 - 21,750</td>
</tr>
</tbody>
</table>

Source: Boston Housing Authority
Table 2
ACTUAL POPULATION OF, AND APPLICANTS TO, FAMILY DEVELOPMENTS WITH INCOMES BELOW 25 PERCENT OF AREA MEDIAN; AND PROPOSED APPLICANT SELECTION RATIOS

<table>
<thead>
<tr>
<th>Developments</th>
<th>Actual Population</th>
<th>Applicants</th>
<th>Applicant Selection Ratio</th>
</tr>
</thead>
<tbody>
<tr>
<td>Charlestown</td>
<td>63%</td>
<td>68%</td>
<td>2:1</td>
</tr>
<tr>
<td>Mission Hill</td>
<td>80%</td>
<td>76%</td>
<td>2:1</td>
</tr>
<tr>
<td>Lenox</td>
<td>68%</td>
<td>75%</td>
<td>2:1</td>
</tr>
<tr>
<td>Orchard Park</td>
<td>78%</td>
<td>84%</td>
<td>2:1</td>
</tr>
<tr>
<td>South End</td>
<td>68%</td>
<td>76%</td>
<td>2:1</td>
</tr>
<tr>
<td>East Boston</td>
<td>75%</td>
<td>75%</td>
<td>2:1</td>
</tr>
<tr>
<td>Franklin Hill</td>
<td>81%</td>
<td>77%</td>
<td>2:1</td>
</tr>
<tr>
<td>Whittier Street</td>
<td>72%</td>
<td>75%</td>
<td>2:1</td>
</tr>
<tr>
<td>Washington-Beech</td>
<td>76%</td>
<td>78%</td>
<td>(2:1)</td>
</tr>
<tr>
<td>Mission Extension</td>
<td>79%</td>
<td>72%</td>
<td>2:1</td>
</tr>
<tr>
<td>Columbia Point</td>
<td>71%</td>
<td>94%</td>
<td>2:1</td>
</tr>
<tr>
<td>Mary Ellen McCormack</td>
<td>54%</td>
<td>63%</td>
<td>2:1</td>
</tr>
<tr>
<td>Old Colony</td>
<td>63%</td>
<td>67%</td>
<td>2:1</td>
</tr>
<tr>
<td>West Newton Street</td>
<td>63%</td>
<td>70%</td>
<td>2:1</td>
</tr>
<tr>
<td>Rutland Street</td>
<td>n.a.</td>
<td>67%</td>
<td></td>
</tr>
<tr>
<td>West Broadway</td>
<td>69%</td>
<td>82%</td>
<td>2:1</td>
</tr>
<tr>
<td>Camden Street</td>
<td>59%</td>
<td>70%</td>
<td>2:1</td>
</tr>
<tr>
<td>Commonwealth</td>
<td>76%</td>
<td>74%</td>
<td>(2:1)</td>
</tr>
<tr>
<td>Faneuil</td>
<td>65%</td>
<td>68%</td>
<td>2:1</td>
</tr>
<tr>
<td>Fairmount</td>
<td>46%</td>
<td>73%</td>
<td>(1:1)</td>
</tr>
<tr>
<td>Archdale</td>
<td>78%</td>
<td>78%</td>
<td>2:1</td>
</tr>
<tr>
<td>Orient Heights</td>
<td>70%</td>
<td>77%</td>
<td>2:1</td>
</tr>
<tr>
<td>Gallivan Boulevard</td>
<td>50%</td>
<td>70%</td>
<td>1:1</td>
</tr>
<tr>
<td>Franklin Field</td>
<td>79%</td>
<td>84%</td>
<td>2:1</td>
</tr>
<tr>
<td>South Street</td>
<td>68%</td>
<td>74%</td>
<td>(2:1)</td>
</tr>
<tr>
<td>All Family Developments</td>
<td>68%</td>
<td>69%</td>
<td></td>
</tr>
</tbody>
</table>

1 The following dollar limits were applied, based upon an area median income of $30,800 for a family of four, announced by HUD in April 1983:
2 Based on 1982 Tenant Status Review
3 Based on waiting list as of February 14, 1983
4 The first number refers to households with incomes above 25 percent of area median income (i.e., in Tier 2). The second number refers to households with incomes below 25 percent of area median income (i.e., in Tier 1). Ratios in parentheses indicate developments at which specific planning may result in different ratios or other variations. In addition to the developments designated in this manner, Franklin Field and West Broadway have been the focus of more preliminary discussions regarding tenant selection planning.

Source: Boston Housing Authority
To accomplish the 50/50 goal in developments where tenants were mostly below the 25 percent median income, a 2:1 applicant selection ratio was established: for every one tenant with income in Tier I, two tenants with incomes in Tier II would be selected. If a given development has close to 50/50 mix, a 1:1 selection ratio would be used. For example, in developments such as Gallivan Boulevard and Fairmount (see Table 2) where the mix was already almost 50/50, a one-to-one tenant selection would be applied.

**Potential Impact on the Tenant Mix Process**

Several factors would determine the outcome of the tenant mix process under the broad range of incomes program. For a given housing development, its turnover rate and the rehabilitation would determine the number of available units. This, coupled with the level of incomes of actual tenants and those applying to the development in question, determine the outcome of the mix over time.

For example, Table 3, which illustrates the possible impacts of the income-mixing program, indicates that total anticipated vacancy for Mission Main in September 1983 was 279 units. Out of these, 186 units would be rented out to tenants with incomes above 25 percent of area median under the two-to-one tenant assignment ratio. In two years time, 40 percent of Mission Main tenants would be tenants with incomes above 25
percent of area median. However, since there were only 211 new applicants to that development, an extra 25 tenants would have to be attracted from elsewhere.

Table 3
EXAMPLES OF THE IMPACT OF 2:1 INCOME MIXING

<table>
<thead>
<tr>
<th>Development</th>
<th>Tenants, Sept. 1983 Incomes &gt; 25%</th>
<th>New Tenants</th>
<th>Tenants After 2 Years</th>
<th>No. of Present Applicants with Incomes &gt; 25%</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Total    %  No.</td>
<td>Expected Turnover</td>
<td>Expected Rehab</td>
<td>Total</td>
</tr>
<tr>
<td>Orchard Park</td>
<td>518      22  114</td>
<td>83</td>
<td>293</td>
<td>286</td>
</tr>
<tr>
<td>Mission Main</td>
<td>460      20  92</td>
<td>74</td>
<td>205</td>
<td>279</td>
</tr>
<tr>
<td>Franklin Hill</td>
<td>316      19  60</td>
<td>51</td>
<td>54</td>
<td>105</td>
</tr>
<tr>
<td>M.E. McCormack</td>
<td>1015     46  467</td>
<td>162</td>
<td>-</td>
<td>162</td>
</tr>
<tr>
<td>Lenox</td>
<td>304      32  97</td>
<td>49</td>
<td>-</td>
<td>49</td>
</tr>
<tr>
<td>Archdale</td>
<td>230      22  51</td>
<td>37</td>
<td>52</td>
<td>89</td>
</tr>
<tr>
<td>Faneuil</td>
<td>253      35  89</td>
<td>40</td>
<td>-</td>
<td>40</td>
</tr>
</tbody>
</table>

1 Based upon BHA residents, as of 1982, analyzed according to 1983 HUD-determined median area income; applied to September 1983 occupancy patterns.
2 Assumes eight percent turnover annually for two years.
3 Assumes present occupancy plus programmed vacancy rehab.
4 Assumes that higher income tenants, as of February 1983, also have moved out at an eight percent rate annually. Thus, adds 84 percent of third column to seventh column.
5 Based upon incomes of applicants as of February 1983, analyzed according to 1983 HUD-determined median income; applied to September 1983 waiting list.

Source: Boston Housing Authority
Institutional Responses to the Proposal

Although, in practice, Spence was granted power by the court to take whatever "actions that are necessary or appropriate," he needed approval from HUD, which provided 80 percent of BHA's funding, and EOCD, which provided the remaining 20 percent. Furthermore, support from the new mayor and the city council was crucial politically as well as practically since most of the support system for public housing came from municipal services. While Spence received approval from the federal and state agencies, he failed to get the support of newly elected mayor Raymond Flynn. With mounting opposition from advocacy groups, most of whom helped his mayoral candidacy, Flynn was not politically prepared to support a program which they opposed.

U.S. Housing and Urban Development

In a letter to HUD dated October 25, 1983, seeking approval of the BHA's proposal, Spence explained the income-mixing program for Boston's public housing developments. His letter stated that what he was attempting to do at BHA was to implement a program that was in fact required by legislation. He wrote, "As you know, the United States Housing Act requires housing authorities to establish tenant selection criteria 'designed to assure that, within a reasonable period of time, the project will include families with a broad range of incomes and will avoid concentrations of lower income and deprived families with serious social problems'" (See Appendix B for content of letter.)

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28 For detailed description of powers of the receiver, refer to Appendix A.
The proposal received immediate approval by HUD. In a short letter to the BHA dated December 6, 1983, HUD was very supportive of the program. (See Appendix C). HUD, in recognition of the financial crisis that the PHAs faced, had sanctioned income-mixing programs established by PHAs at least since the 1974 Act.

HUD's role in influencing the tenant selection and assignment process of LHA's was first established in 1967, only two years after its creation. In response to the failure of LHA's to desegregate public housing developments, HUD had established the so-called 1-2-3 plan based on a single waiting list. Under this plan, the next available unit, regardless of location, would be assigned to the next eligible applicant on the waiting list. If that applicant rejected the unit, the applicant would go to the bottom of the waiting list or to the next available unit at a location with the highest vacancy if there were vacancies in more than one location. If the applicant were to refuse that unit, he or she would be eligible for a unit at the location with the next highest number of vacancies.\(^{29}\)

HUD's policy to stop the segregation practices of LHAs had an adverse effect, as far as LHAs were concerned, on their operating cost. Since many of the applicants were very low income families, the 1-2-3 plan, in its first-come first-served approach, would inhibit any LHA attempt to establish tenant assignment with the "correct income range to keep the project on an even financial keel."\(^{30}\)

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\(^{30}\) Ibid., p. 45.
By the seventies, HUD had recognized the serious need to address the problem of public housing being overwhelmingly occupied by the very poor. Table 4 shows that as median income for the country steadily increased, the income of public housing tenants as a percentage of U.S. median continuously dropped. Between 1950 and 1977, tenants' median income as a percentage of U.S. median had dropped almost by half from 57% to 27%.

Table 4

<table>
<thead>
<tr>
<th>Year</th>
<th>Median Income of Public Housing Residents</th>
<th>Median Income of U.S. Population</th>
<th>Public Housing Median as % of U.S. Median</th>
</tr>
</thead>
<tbody>
<tr>
<td>1950</td>
<td>$1,888</td>
<td>$3,319</td>
<td>57%</td>
</tr>
<tr>
<td>1955</td>
<td>1,844</td>
<td>4,418</td>
<td>42</td>
</tr>
<tr>
<td>1960</td>
<td>2,294</td>
<td>5,620</td>
<td>41</td>
</tr>
<tr>
<td>1965</td>
<td>2,524</td>
<td>6,957</td>
<td>36</td>
</tr>
<tr>
<td>1970</td>
<td>2,501</td>
<td>8,734</td>
<td>29</td>
</tr>
<tr>
<td>1975</td>
<td>3,362</td>
<td>11,800</td>
<td>28</td>
</tr>
<tr>
<td>1976</td>
<td>3,437</td>
<td>12,686</td>
<td>27</td>
</tr>
<tr>
<td>1977</td>
<td>3,691</td>
<td>13,572</td>
<td>27</td>
</tr>
</tbody>
</table>


a Public housing figures are for fiscal year, U.S. figures for calendar year. It should be noted that census definitions of income have changed over time, and that there are some inconsistencies in the definitions applied by the census and the much looser data gathering procedures of the public housing system.

b Median income figures for public housing are based on reexamination of established households and do not include households moving in during the year, with the exception of the entry for 1970 which comes from data for new households admitted during the first six months of the year.
As a result of the increase of low-income tenants, revenue from rents declined. Quoting from a June 2, 1971 HUD circular entitled "Housing a Cross Section of Low Income Families in Low Rent Public Housing," Jayne E. Shister wrote,

HUD was concerned over the "excessively high operating costs and, in some instances, deplorable deterioration of the environment in which tenants live. Sharp increases in vandalism and crime, accompanied by the move-out of families still eligible and in need of public housing, have resulted in either, or both, high vacancy rates or concentrations of the lowest income families, many with serious problems."31

While HUD did not establish or require a specific type of income-related tenant selection, it had been clear since the early seventies and specifically since the 1974 Act, that it would sanction income-mixing strategies such as the one proposed by the BHA. HUD’s regulation, according to Jayne E. Shister, had allowed LHA’s to set preferences for those tenants "who ensured the financial solvency and stability of the [public housing] program." Shister goes on to state that HUD’s regulation had "required LHA to take steps to stimulate application from wage-earning and two-parent families."32

The State’s Executive Office of Communities and Development

With HUD’s approval in hand, the BHA next approached EOCD for its approval. However, EOCD had reservations about the proposal, fearing the adverse effects it might have on welfare recipients, minorities and large

31 Ibid., pp. 52-53.
32 Ibid., p. 53.
families. It was also concerned about equity issues for those who had been on a waiting list for a long time.

To address those issues, the BHA had established criteria that would give very low-income applicants and welfare recipients priority for the Section 8 subsidy. Families on BHA's waiting list who were in Tier I, for example, would be given priority for this program and those in Tier II would have access to the next available public housing unit.

The BHA responded to the concern over the success rate of welfare recipients and minority groups in finding units in leased housing by presenting evidence which showed that AFDC recipients did not have difficulty finding units in the private housing market. In a letter to Langley Keyes, EOCD's Associate Secretary at the time, John Washek, Assistant to the Receiver, stated that "... AFDC recipients have a higher success rate than do employed Certificate holders" in finding units to rent."33

On May 14, 1984, Secretary Amy Anthony wrote to the BHA indicating EOCD's "conditional" approval of the Broad Range of Incomes Program. The conditions that were imposed on the BHA were to guarantee that there would be no adverse effects on low income families and specifically on those on welfare. The letter stated that:

EOCD had serious concerns about the potential impact of the BHA proposal. While the "Broad Range of Incomes" program might improve certain aspects of the public housing developments involved, it is critical that such a policy not discriminate against very low income applicants to the BHA, particularly welfare recipients.

33 See Appendix D for letter from BHA with data on the success rates for Section 8 certificate holders.
The Mayor's Office

The mayor's office rejected Spence's proposal. Largely owing to opposition by coalitions of advocates for the poor, the mayor was not politically prepared to accept the proposal.

Stating that he would prefer to see improved employment opportunities through job-training for the existing tenants, Flynn indicated his opposition to the proposed tenant mixing program. In explaining his rejection of the proposal, Mayor Flynn reiterated some of the arguments used by advocacy groups, particularly those of the homeless advocates, who were opposed to the proposal. In a letter to EOCD, dated May 29, 1984, Mayor Flynn wrote:

In light of the current housing crisis in the City, particularly as it impacts low-income residents, I find it difficult to support the proposed BHA tenant selection policy. As you know, there is a severe housing shortage in the City, particularly for low-income residents. The current BHA waiting list of 6,000 eligible families is an indication of the severity of the problem in the private housing market. (See Appendix F)

During his mayoral candidacy, he had used housing issues to win support from tenant organizations who were becoming effective political lobbying forces in the city. By supporting pro-tenant issues such as rent control and tenants rights, he had gained support from tenants and organizations that represented them. While both front runners, Mel King and Flynn, had expressed pro-tenant views and made housing for low-income families one of their important agendas, endorsements from groups such as the Massachusetts Tenant Organization had boosted Flynn's candidacy and helped put him in office. In light of this background, it was politically impossible for him to support the income-mixing proposal since the issue was
already hot with demonstrations by housing advocates, and television and newspaper coverage of the controversial proposal.

The Mayor's rejection and a possible law suite from the Civil Liberties Union of Massachusetts as well as mounting opposition from coalitions of advocacy groups finally brought the demise of the Broad Range of Incomes Program.
CHAPTER THREE: THE CONTROVERSY

While the BHA proposed its income-mixing program in the belief that it was in the best interest of the public housing tenants, it was vehemently opposed by many advocacy groups for the poor. This chapter presents the arguments between the proponents of the proposal and those who were opposed to it.

Proponents’ Argument

On April 26, 1984 the Boston Globe published the following editorial highlighting the merits of the BHA’s proposal for the Broad Range of Incomes Program and echoing the arguments of the program’s proponents:

First, an increase in the number of working poor in the projects may bolster the political constituency for public housing; second, an increase in the percentage of working poor living in public housing may mean more male-headed households in the projects and may enhance the ability of their adult communities to control the teenage boys who frequently dominate them....The trade-off involved in the BHA plan - one that favors [community benefit] over [individual benefit]- does not sit well in a society steeped in the value of individual rights and liberties. However, the policy change is a bold and welcome step toward strengthening the political clout and social stability of public housing and toward more fully integrating Boston’s poorest residents into the life of the city.34

Central to the BHA’s argument was the conviction that the isolation and concentration of poor, nonworking families, away from the rest of society, had created a politically, economically and socially weak tenant constituency in the

public housing developments. In order to remedy this situation, there were three key issues that the income-mixing proposal was intended to address: First, the public housing constituency could be empowered through increased tenant participation in decentralized tenant organizations. Second, working families could be brought to be role models as well as to bolster the political constituency of public housing. Third, though this was not stated explicitly, the BHA hoped to increase the number of adult males in public housing.

Tenant Empowerment

The argument for tenant empowerment was premised on the belief that working people are more likely to have organizational skills than nonworking people. In order to increase tenant participation and create tenant organizations at each development, proponents of the income-mixing proposal believed that it was imperative to have more working people in BHA's housing developments. A semi-annual report to Judge Paul Garrity in August 1982 contained the following explanation regarding the need for strong local tenant organizations:

The Receivership's interest in helping to build resident capacity reflects an acknowledgement that management improvements and capital investment alone may not ensure the long-term reconstruction of BHA's housing developments; that secure viable communities are a prerequisite for physical reconstruction; and such communities can be developed only in partnership with strong, capable resident bodies.35

Only through empowered tenants who were able to participate in decisions that affect their living conditions, proponents argued, the long-term interests of the public housing program and its community could be realized. Spence stated that:

The decision to seek to empower yourself by itself implies that you have already begun to be empowered. You can’t make the decision to empower yourself from nothing. There needed to be a ground on which an empowerment strategy could be built. That ground needed to be some small number of persons who had some sense of their empowerment. This society derives that from work relations. That is where I started.36

The BHA had assumed that one of the the key aspects of maintaining viable communities in public housing was to develop tenant capacity to deal with issues at the local level. The kinds of tasks envisioned for the local tenant organizations were different from the traditional tasks of social services such as crisis intervention and counseling. While such services were part of the program, the emphasis here was more on creating programs to increase employment through job training and to train residents in community organizing skills. The BHA had already started such programs for local tenant organizations under the receivership. In 1982, for example, the Supportive Services Program was established to provide funds for tenant task forces to be used for educational, employment and community organization tasks.

In the effort to create tenant task forces, however, the BHA staff had discovered that those who showed interest and participated in task force meetings were mostly working tenants, despite the fact that the projects were occupied primarily by nonworking tenants. At Franklin Field, one of the

36 Interview with Harry Spence, March 1991.
projects where tenant organizing efforts were carried out early in the receivership, Spence stated that it was mostly working tenants who showed an interest in tenant participation. Two-thirds of the tenants who participated in meetings at this development, according to Spence, were working tenants, at a time when only fifteen percent of Franklin Field tenants were working people. (See Appendix B.)

The increased interest and willingness of working people to participate in tenant organizations was attributed by BHA staff to experience gained at the work place. This view was based on the premise that at the work place, people are engaged in collective activities that enhance their organizational abilities. Therefore, increased presence of working people in the public housing developments was preferred by the BHA who argued that it would enhance the organizational capacity of tenants and eventually lead to their empowerment.

**Working People as Role Models**

Many of the BHA's tenants at the time of the receivership were, as they are today, unemployed. That situation, the BHA argued, contributed to the isolation of residents resulting in their withdrawal from the rest of society, and an fostered an ambivalence toward job finding and self-improvement.

Requesting HUD's approval for its income-mixing proposal in a letter dated October 25, 1983, the BHA explained the effects of concentrating large numbers of unemployed people in public housing as follows:

In Boston, a number of family public housing projects are occupied almost solely by the very poor. Residents of these developments are almost totally isolated from others in our society whose opportunities and outlook give them reasonable hopes and prospects for the future.
This situation reduces the chances that residents, particularly teenagers and young adults, will acquire the attitudes and opportunities to become successful. In addition, some of the common by-products of a lack of purpose for the present or hope for the future, notably additional crime, disorder, vandalism and disinterest in property conditions, clearly have contributed to deterioration at BHA developments and thus to the need for the receivership. (Appendix B)

The lack of working role models was seen by the BHA staff as detrimental to teenagers and to the growing experience of children in public housing. Rod Solomon, lawyer in the legal department of the BHA and a member of the authority's staff during the receivership, stated that "It was a good goal to have teenagers and kids growing up some place where there are more people around that are going to work, and living [their] lives like the rest of America's communities live." Acknowledging that there were indeed working role models in the housing developments, he argued that "since a large majority of the tenants were not working, we believed it would certainly help to increase the numbers of those who worked in public housing."

Increasing the Numbers of Adult Males

Although not explicit, one of the unspoken goals the BHA wanted to achieve by bringing more working people into public housing was to have more male-headed households. Most of these developments had a high ratio of minors to adults and a disproportionately high number of female-headed households. The rational for increasing the number of adult males was the belief that vandalism and crime committed by teenagers would be reduced as a result of fear of the physical strength of adult males: "... an increase in the

percentage of working poor living in public housing" stated a *Boston Globe* editorial, "may mean more male-headed households in the projects and may enhance the ability of their adult communities to control the teenage boys who frequently dominate them."\(^{38}\)

Spence had also argued that, while a few women may have "the force of character" or the "physical force" to control teenagers in the public housing projects, most of the time that was not the case in many of BHA's developments. He stated that:

They're [male teenagers] more brutal than any other part of humanity—that's why they fight all the wars in the world, or sent to fight them; it's a particularly brutal time. ...You get the rare woman who has either the force of character or in some cases the physical force, to drive ten stoned, drunk teenagers out. But in nine cases out of ten, it's got to be somebody bigger and stronger.\(^{39}\)

**Opposition from Advocates for the Poor**

A number of advocates for the poor, along with Tenants United for Public Housing, staged a large demonstration on April 24, 1984, outside the BHA's office in opposition of the income-mixing proposal. In the following weeks, opposition from welfare advocates, women's advocates and advocates for the homeless continued to grow.

The advocates' argument against the proposal was premised on the belief that: first, the proposal was based on demeaning assumptions about the poor, second that it would only reinforce stereotyping and third, and more

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importantly, that public housing should be for the most needy and not for designing ideal communities at a time of scarcity.

_Demeaning Assumptions about the Poor_

The view that "nonworkingness" leads to the isolation of the poor from the rest of society drew harsh criticism from several advocates. While it was because of their poverty that they lived in public housing projects, advocates argued that public housing residents are not necessarily isolated from the rest of society. They noted that public housing residents vote, read newspapers, send their children to school, and engage in economic activities.

In response to a _Boston Globe_ editorial regarding the BHA's income-mix proposal, the Coalition For Basic Human Needs wrote:

> Because someone is on welfare, are they no longer in contact with the real world? With 9-10% of all Boston's residents living in public Housing Projects, we find the comment that Housing projects are isolated from "wider" society is not only classist, but an attack on the neighborhoods and communities in which we live. Income determines the choices we have. Poverty leaves us with very few, but it certainly doesn't mean that we are not in routine contact with "society." We are an integral part of this society; working by trying to raise our children like everyone else.40

Writing for the Boston Globe Editorial, Monica Hileman, coordinator of the Boston Chapter of the Massachusetts Coalition for the Homeless at the time stated:

> Underlying the BHA move to thin out the number of welfare recipients in public housing are belittling assumptions about women and the poor:

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40 Response to The _Boston Globe_ Editorial from the Coalition, April.
that what women do in the home is not valuable, that it is not "work"; and that the poor are responsible for their poverty.41

Stereotyping of Women

The idea that adult males would help control vandalism and crime committed by male teenagers in the public housing projects brought criticism from the advocate groups, especially those concerned with women's issues. They argued that the "male role model" view suggested that women in public housing are incapable of controlling their own children. Noting that services like job training, employment opportunities and day-care centers were what were needed in these developments, they argued that the income-mixing strategy ignored the real problems of increasing unemployment and poverty that resulted from the insensitive policies of the federal government. The Coalition for Basic Human Needs wrote:

To suggest that more men in public housing projects will control teenage boys is not only sexist, but ignores the economic factors which leave many poor teenagers unemployed all over the city. By implying that more "male-headed households" will be able to better control our families, suggests that women are inherently incapable of taking care of their own families.42

Housing for the Most Needy

The argument for maintaining housing for the most needy grew out of the conditions in which the poor were increasing while government assistance was decreasing. Advocates for the poor, particularly homeless advocates, argued that at a time when federal assistance in the provision of public housing was diminishing and homelessness was becoming a crisis, public

41 "Wrong way to select tenants", The Boston Globe, April 26, 1984.
42 Ibid.
housing should remain as a last resort for those who are most in need. They argued that because welfare recipients and large families were discriminated against in private market housing, public housing was the only choice they had left.

Advocates of the homeless are particularly concerned that the proposed change in tenant selection not be approved. Over the past few years, the number of homeless families has been increasing at a disturbing rate. Shelter operators and advocates for the homeless view the growth of the "shelter industry" with unease. "We’re becoming the public housing for the poor," remarked one person who works in a shelter.

A recent report, 'More than Shelter: A Community Response to Homelessness,' tells of people being trapped in shelters because of a situation in which 'landlords make no secret of the fact that they choose only 'appropriate' tenants and that the 'inappropriate' include women receiving AFDC, black or Hispanic families, and often, any family including young children.'

Much needs to be done to improve the quality of life in Boston's projects. Yet discrimination cannot be tolerated in the private market, and certainly should not be instituted in the public one. People on public assistance need more access to public housing, not less. 43

43 ibid.
CHAPTER FOUR:  
ANALYSIS: FORCES THAT SHAPED THE NATURE  
OF THE CONTROVERSY

This chapter analyzes the different forces that shaped the views of the BHA and the advocacy groups, as well as the nature of the controversy regarding the broad range of incomes proposal.

First, the chapter analyzes the different views on the question of who should live in public housing. The BHA’s view was that public housing should not be housing of last resort; thus it proposed to integrate the working poor with the largely unemployed tenants in its public housing developments. The advocates view was that public housing should be reserved for the neediest because they had limited choice in private housing. Both the historical background of the public housing program and the political and economic context of the 1980s are discussed as they relate to the shaping of these different perspectives.

Second, the chapter analyzes the implicit frames through which the debates between the BHA and the advocacy groups were played out. This section argues that the implicit framing of the BHA’s proposal in the "community needs" frame led to a solution that justified the limitation of access to public housing for certain groups such as the unemployed and welfare dependents. As a result, a controversy was created that was played out in a symbolic battle between the issues of "community needs" and "individual
group needs” for publicly assisted housing. Because of the symbolic nature of the conflict and its emotional tone, the chance for a compromise was eroded.

Finally, the chapter suggests an alternate frame in which a less controversial program could have succeeded along the same lines as the BHA’s goal. A program based in this frame would have the primary objective of providing increased access and choice for the unemployed and welfare dependents to move into leased housing. Such a program could have gathered support both from tenants and advocacy groups.

**Who Should Live in Public Housing?**

The question underlying the income-mixing proposal was: the question of who among the poor should live in public housing? Should it be the “working poor,” who were considered to be less troublesome and were as much in need of housing as the very poor? Or should it be the so-called "undeserving poor" who were welfare dependent and very poor? In the face of declining resources and increasing poverty and homelessness, the advocates argued that public housing should be reserved for the most needy.

These conflicting views between the BHA and the advocacy groups were shaped both by the historical background of the public housing program and by the political and economic conditions of the 1980s.
**Historical Aspects**

Historically, the tradition of advocacy in housing is primarily built on protecting the needs and rights of certain groups of people considered to be the most in need of shelter. By virtue of their race, income or class, these groups have been discriminated against by the dominant political, social or economic group. In their bid to assure equal access to public housing and eliminate practices that deny access to such groups of people, advocates have actively challenged both the local and the national practices of PHAs since the 1960s.

The advocacy tradition that challenged discrimination and segregation in public housing was posited on two views: people should not be denied access on the basis of race, class or income, and public housing should be for the most needy. The advocacy groups' reaction toward the BHA's proposal was based mostly on their belief that the program denied access to the unemployed or single mothers on the basis of their income or class. It was also based on the belief that these people should have priority in public housing because they faced discrimination in private housing.

Since public housing became increasingly occupied by poorer tenants beginning in the 1950s, PHAs were faced with both financial problems in their operating budgets and security problems in their housing developments. Poorer tenants and a subsequent decline in rent revenue, coupled with insufficient federal assistance, exacerbated the weak financial conditions of PHAs. Increased vandalism and crime, as well as increasing levels of poverty, had undermined the socioeconomic conditions of public housing residents. While some analysts attributed these
conditions to the practices and programs of local and federal housing authorities, others have attributed them to the concentration of very poor and lower class people in public housing.\textsuperscript{44} It stands to reason that because the BHA believed that the concentration of the very poor was the cause for the deteriorating socioeconomic conditions, they would seek to eliminate the concentration by designing a program that favored the working poor over the unemployed.

While race, income and class remained central issues in the development of any public housing program, the need to shape the character of public housing communities had become an important aspect in determining who would be housed in public housing. Since the sixties, the need to integrate public housing racially and/or by income had become an increasingly important issue for PHAs. In this sense, the question of who among the poor should live in public housing was not only a question of equity, but also a question about the character of the communities that were shaped by policy makers.

\section*{The Political and Economic Context}

The early 1980s marked the beginning of a conservative political period that was less sensitive to the poor. Soon after Reagan took office in 1981, the welfare system, particularly the public housing program was under threat. While designating the existing public housing stock as a

\textsuperscript{44} Pynoos, pp. 190-191.
"safety net" to the "most needy," the federal government moved away from providing any additional public housing.

**Diminishing Subsidized Housing Stock**

In 1981, the Reagan administration's policy for assisted housing required that public housing units be allocated almost entirely to families with household incomes below 50% of area median income. At the same time, the government reduced its commitment to providing subsidized housing stock, favoring rather the use of existing stock. Table 5 illustrates the trend in assisted housing stock between 1977 and 1984. As the figures in the table indicate, between 1980 and 1983, there was a drastic decrease in subsidized housing stock immediately following Reagan's first term in office.

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45 Turner and Struyk, p. 38.
### Table 5
TRENDS IN ASSISTED HOUSING PROGRAMS
ADMINISTERED BY THE DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

<table>
<thead>
<tr>
<th>Fiscal Year</th>
<th>Net Incremental Units (^a) (in Thousands)</th>
<th>Percentage New Construction and Substantial Rehabilitation</th>
</tr>
</thead>
<tbody>
<tr>
<td>1977</td>
<td>388</td>
<td>52</td>
</tr>
<tr>
<td>1978</td>
<td>326</td>
<td>55</td>
</tr>
<tr>
<td>1979</td>
<td>325</td>
<td>61</td>
</tr>
<tr>
<td>1980</td>
<td>187</td>
<td>63</td>
</tr>
<tr>
<td>1981</td>
<td>177</td>
<td>43</td>
</tr>
<tr>
<td>1982</td>
<td>52</td>
<td>12</td>
</tr>
<tr>
<td>1983</td>
<td>50</td>
<td>(\text{c})</td>
</tr>
<tr>
<td>1984(^b)</td>
<td>89</td>
<td>5</td>
</tr>
</tbody>
</table>


\(^a\) Net incremental units is the gross number of incremental units to be assisted, less conversions of units from one program to another and the cancellation or deobligation of units for which funds were appropriated in prior years.

\(^b\) Estimated.

\(^c\) Percentage new construction and substantial rehabilitation is negative owing to deobligations.


While the advocacy groups felt that this trend in housing policy warranted the allocation of public housing solely for the most needy, the BHA had different thoughts. Regarding the position taken by the BHA’s policy makers at the time, Pynoos, wrote:

...faced with limited ability to improve environmental conditions in public housing, let alone do much about the underlying conditions of poverty that contributed to the problems, many found themselves retreating from the stance that public housing should be the housing of last resort. Instead, given the government’s movement away from from providing additional new public housing units, their pragmatic approach became one of trying to preserve the existing public housing stock for low-income people.\(^{46}\)

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\(^{46}\) Pynoos, p. 191.
The thinking of the BHA’s policy makers at the time was that the threat to public housing came not only from the federal government but also from the general public. In order to gain support from the larger public, the BHA believed that the image of public housing had to be improved. Through the economic integration program it proposed, the BHA believed it would not only create viable communities in the existing public housing developments, but by improving its image, it hoped to gather support for building public housing in the future. Spence recalled:

The only hope of building more was to link those communities to the larger community in the way that would satisfy people inside and outside the community and hope to restore some confidence. I believed that if we created such communities, they would be very healthy and vital communities and that the larger public would be in favor of building more public housing.”

Unfair Policies Regarding the Poor

The prevailing thought among the conservative politicians who came into power in the 1980s was that the poor were at the bottom of the economic heap as a result of their own actions. The Reagan administration, for the most part, blamed those in poverty, including welfare dependents and the unemployed, for being in that condition. In the 1980s, many conservatives believed that welfare programs such as AFDC encouraged out-of-wedlock childbearing and that welfare in general encouraged the poor not to work. Describing the prevailing sentiment of the early 1980s toward welfare dependants and the homeless, Robert Emmet Long wrote: “President

\[\text{47 Interview with Harry Spence, March, 1991.}\]
Reagan's attitude toward those on welfare was at best unsympathetic; he spoke of 'welfare queens' who arrived in Cadillacs to pick up their welfare checks, and referred to the homeless as 'homeless, you might say, by choice.'"49

Under Reagan, the federal government was "unsympathetic" toward the poor not only in its attitude but also in its economic policies. For example, in its 1982 budget it slashed spending for AFDC programs by 11.2%. Some 450,000 families lost AFDC benefits as a result of strict limitations on the level of income to be eligible. Furthermore, 1 million families lost food-stamp benefits while over half a million children lost medical benefits. Combined spending for the poor by 1984 had dropped by 7% from what it was in 1981.50

Homelessness

The number of people who became homeless in 1983 was considered by some to be the highest "at any time since the Great Depression." The homeless population increased by 500,000 in the one year between 1982 and 1983, according to the National Coalition for the Homeless, which put the figure at 2.5 million for 1983. HUD's estimate of between 250,000 and 350,000 for the same period was less than the Coalition's. While it was difficult to

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determine the actual number, homelessness was nevertheless recognized as a national crisis by the early 1980s. 51

While homelessness was being recognized as a crisis and the subsidized housing stock was diminishing, the price of low-income housing had skyrocketed. In an article for the Yale Review, Jonathan Kozol argued that the shortage of low-income housing was the major cause of increased homelessness in the eighties. In just two years, between 1978 and 1980, Kozol reported, there was a 30% increase in the median rent to those with the lowest income, which, he argued, had put many people out on the street. "In Boston," he stated, "between 1982 and 1984, over eighty Local Housing Authority's (LHA) of the housing units renting below three hundred dollars disappeared, while the number of units renting above six hundred dollars nearly tripled." 52

Summary

In light of the political and economic climate that was unfair in its attitude as well as its economic policy toward the poor, it was not surprising that welfare advocates, advocates for the homeless and women's rights advocates were vehemently opposed to the BHA's income-mixing proposal. For them, one message came out loud and clear from the proposal's inherent preference for the working poor over non-working people, or for two-parent families over female-headed families. This was

the message that echoed the prevailing sentiments of the Reagan administration toward the poor. "What a condescending attitude that was," recalled Maryann Martorana, Vice President of the Massachusetts Tenants Organization (MTO), a housing advocate who actively opposed the proposal in 1984, referring to the BHA's argument that the unemployed would be able to find jobs as a result of integration with working people. "That assumed," she went on, that "people who lived in public housing were stupid and lazy. It was part of all those stereotypes that the larger society was putting on poor people; they don't want to work, they don't know how to work, etc."53

In a political climate where issues about the very poor and the homeless were taking center stage, BHA's proposed income-mixing program was not acceptable to the advocacy groups because of its perceived unfairness to the poor. They could support a program that would limit access to lower class families in the name of some larger community goal, even though the proposed program would still serve very poor people; if not on substantive grounds, it had to be opposed on symbolic grounds.

Conflicting Frames as Cause to an Irreconcilable Controversy

The Community Needs Frame

In arguing for the economic integration program, the BHA premised its proposal on the belief that the public housing tenants had problems as a community. The BHA saw its stated objective--to create

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53 Interview with Maryann Martorana, Vice President of the Massachusetts Tenants Organization (MTO), April, 1991.
viable communities in the public housing developments—as meeting the needs of the larger community. As such, its arguments were organized under a "community needs" frame.

Six years after the BHA’s receivership ended, on March 8, 1991 Spence reminisced about the BHA’s proposal for the Broad Range of Incomes Program.

When you have an institutional responsibility, you often represent the communal interest....as an advocate your task in many ways is to represent the individual interest. My own belief is that there is no salivation without community. I believe that if we create such communities they will be very healthy and vital communities and that the larger public will be in favor of building more public housing.54

Once the BHA’s proposed solution was implicitly framed in the "community needs" perspective, the issue of equity and fairness became secondary to the issue of community needs. Despite the proposal’s inherent inequity, the action became justified when viewed through this frame; the community need took precedence over the needs of any single group of people. Therefore, the solution that was born of this frame was primarily based on limiting people’s access to public housing based on their income or class, for the sake of greater social good.

In a program such as public housing where issues of race, income and class are central, and at a time when the very poor were politically and economically vulnerable, one predominant message was heard out of the "community needs" frame: “certain groups of people are being denied access because of their income or class.” Primarily for this reason, many

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tenants and the advocacy groups who represented their interests reacted immediately to oppose the proposal. Thus, an irreconcilable controversy was created that was debated more on symbolic grounds than it was on substantive issues.

The Individual Group Needs Frame

In opposing the income-mixing proposal, the advocacy groups' arguments became organized under the "individual group needs" frame. The advocacy groups spoke of the need for public housing among welfare recipients, the homeless, single mothers and AFDC recipients. In the implicit frame of reference, advocacy groups put the needs of welfare recipients, single mothers and the homeless ahead of a program that the BHA viewed as meeting a larger community need. This created a controversy, the tone of which was set in a symbolic battle between the "community need" and the "needs of individual groups" for a publicly funded program. Once the controversy took this symbolic nature and became wedged in emotional arguments, the chance for compromise was eroded.

Symbolic Conflict

The symbolic nature of the controversy was reflected in the rhetoric that the BHA and the advocacy groups used either to persuade their audiences or to defend or advance their positions. The BHA, for example, used phrases such as "tenant empowerment," "isolation of the poor," "viable communities" and
"role models" as symbolic, persuasive tools to represent abstract ideas. All these phrases infer or reinforce the "community needs" perspective in which the BHA's income-mixing proposal was implicitly framed. Similarly, to advance their "individual group needs" frame, the advocacy groups used phrases such as "demeaning assumptions," "stereotyping," "blaming the victim," and the "most needy"--to symbolically represent groups of people with certain needs.

The symbolic nature of the controversy was also reflected as each side used the same evidence to support their conflicting views. This was best exemplified in the debate over the success rate of Section 8 programs. Advocacy groups opposed the BHA's Section 8 subsidy as a supplement to reduce the adverse effect of the income-mixing proposal on the grounds that discrimination in private housing would make them useless for families such as AFDC recipients or black and Hispanic applicants. The BHA, arguing that in fact these groups had the same or better success rates compared to total applicants, used the data in Table 6 as evidence. This was contained in a letter from the BHA to the EOCD. (See Appendix D)

To determine the success rates of applicants who were able to find units, the BHA used the percentage of certificate holders by race and source of income. As Table 6 indicates, while total success rate for Section 8 certificate holders was 59%, Hispanic certificate holders had the highest success rate at 62%, followed by black certificate holders who had a 59% success rate and whites at 56%.
Table 6
DISTRIBUTION OF SECTION 8 CERTIFICATE HOLDERS
BY RACE AND INCOME SOURCE
(SUCCESS RATES ARE INDICATED IN PARENTHESES)

<table>
<thead>
<tr>
<th>Income Source</th>
<th>White</th>
<th>Black</th>
<th>Hispanic</th>
<th>Other</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>AFDC</td>
<td>340</td>
<td>1659</td>
<td>457</td>
<td>20</td>
<td>2476</td>
</tr>
<tr>
<td></td>
<td>(64%)</td>
<td>(59%)</td>
<td>(65%)</td>
<td>(35%)</td>
<td>(61%)</td>
</tr>
<tr>
<td>Employed</td>
<td>159</td>
<td>947</td>
<td>121</td>
<td>51</td>
<td>1278</td>
</tr>
<tr>
<td></td>
<td>(52%)</td>
<td>(58%)</td>
<td>(60%)</td>
<td>(37%)</td>
<td>(56%)</td>
</tr>
<tr>
<td>Soc. Sec./Retired</td>
<td>350</td>
<td>110</td>
<td>12</td>
<td>12</td>
<td>484</td>
</tr>
<tr>
<td></td>
<td>(50%)</td>
<td>(56%)</td>
<td>(33%)</td>
<td>(67%)</td>
<td>(52%)</td>
</tr>
<tr>
<td>SSI</td>
<td>103</td>
<td>72</td>
<td>28</td>
<td>2</td>
<td>205</td>
</tr>
<tr>
<td></td>
<td>(42%)</td>
<td>(43%)</td>
<td>(64%)</td>
<td>(50%)</td>
<td>(45%)</td>
</tr>
<tr>
<td>General Relief</td>
<td>24</td>
<td>70</td>
<td>14</td>
<td>2</td>
<td>110</td>
</tr>
<tr>
<td></td>
<td>(42%)</td>
<td>(69%)</td>
<td>(43%)</td>
<td>(50%)</td>
<td>(59%)</td>
</tr>
<tr>
<td>Multi Source</td>
<td>451</td>
<td>473</td>
<td>124</td>
<td>20</td>
<td>1068</td>
</tr>
<tr>
<td></td>
<td>(57%)</td>
<td>(54%)</td>
<td>(61%)</td>
<td>(45%)</td>
<td>(56%)</td>
</tr>
<tr>
<td>Other</td>
<td>41</td>
<td>181</td>
<td>12</td>
<td>2</td>
<td>236</td>
</tr>
<tr>
<td></td>
<td>(71%)</td>
<td>(86%)</td>
<td>(50%)</td>
<td>(100%)</td>
<td>(82%)</td>
</tr>
<tr>
<td>Total</td>
<td>1468</td>
<td>3512</td>
<td>768</td>
<td>109</td>
<td>5857</td>
</tr>
<tr>
<td></td>
<td>(56%)</td>
<td>(59%)</td>
<td>(62%)</td>
<td>(43%)</td>
<td>(59%)</td>
</tr>
</tbody>
</table>

Source: Boston Housing Authority

In response to the BHA's claim about the Section 8 success rate, advocacy groups used the same data to point out its failure rate. In a letter dated May 29, 1984, Sue Marsh, a housing advocate from Family Services of Greater Boston, wrote to the BHA arguing that black and Hispanic AFDC recipients had a high failure rate in finding housing through the Section 8 program. She wrote:
I have looked at Mr. Washek's data in terms of the number of unsuccessful AFDC recipients, particularly those who are black and Hispanic. According to Mr. Washek's figures, there are six times as many black AFDC certificate holders as white AFDC certificate holders who failed to find housing in the Section 8 program. Disregarding race, one-and-a-half times as many AFDC Section 8's failed to find housing than did employed section 8's. (See Appendix G.)

The data in Table 7, which Marsh presented as evidence, was the same data used by the BHA except that, instead of using percentages, Marsh made the comparison in terms of sheer numbers. Interestingly, while the BHA used the data to claim a "success rate" Marsh and the other advocates pointed out "failures." Although the data remains the same, the players' conflicting positions are reinforced by the contradictory methods used to interpret the data.

Table 7
INCOME MIX—SECTION 8 FAILURES

<table>
<thead>
<tr>
<th>Certificate holder</th>
<th>Success Rate</th>
<th>Number of failures</th>
</tr>
</thead>
<tbody>
<tr>
<td>AFDC - white</td>
<td>64%</td>
<td>191</td>
</tr>
<tr>
<td>AFDC - black</td>
<td>59%</td>
<td>1153</td>
</tr>
<tr>
<td>AFDC - Hispanic</td>
<td>65%</td>
<td>246</td>
</tr>
<tr>
<td>AFCD - other</td>
<td>35%</td>
<td>37</td>
</tr>
<tr>
<td>employed - white</td>
<td>52%</td>
<td>146</td>
</tr>
<tr>
<td>employed - black</td>
<td>58%</td>
<td>685</td>
</tr>
<tr>
<td>employed - Hispanic</td>
<td>60%</td>
<td>80</td>
</tr>
<tr>
<td>employed - other</td>
<td>37%</td>
<td>86</td>
</tr>
<tr>
<td>AFDC - total</td>
<td>61%</td>
<td>1427</td>
</tr>
<tr>
<td>employed - total</td>
<td>56%</td>
<td>997</td>
</tr>
</tbody>
</table>

Source: Boston Housing Authority
Thus, in a controversy rooted in conflicting and symbolic frames, the evidence played a less than significant role in convincing the other side. The same evidence produced conflicting results when viewed through conflicting frames.

**An Alternate Frame**

The framing of the income-mixing proposal led to a controversy that was nested in a symbolic conflict between "community needs" and the "needs of certain groups." The proposal that came out of the "community needs" frame, led to the justification of the "denial of access" to public housing for groups of people based on income or class. As a result, the controversy became emotionally charge and no compromise could be reached. A proposal framed as "enabling" access rather than "denying" access to the poor could have created less controversy and a better chance of acceptance. By primarily focusing on getting the unemployed people into a more economically integrated neighborhood, it might have garnered more support from the tenants and advocacy groups.

Early on, there was an opportunity to frame the income-mixing program as one developed to give welfare recipients access into leased housing units. In his bid to gain support from mayoral candidates Mel King and Raymond Flynn, Spence had approached both with his income-mixing proposal.

At the time, King had suggested an alternate proposal in which choices were given. In this proposal, according to King, an unemployed
family that was next on the waiting list for public housing but could not get in due to the 2:1 ratio would have priority to take advantage of the Section 8 subsidies for leased housing, without losing their position on the waiting list.

"Out of Mel's suggestion," Spence said "we developed this whole second half of the program, which made a lot of sense....It [Broad Range of Incomes Program] would have been an indefensible program as I first proposed it." 55 Spence did incorporate King's idea into the broad range of incomes proposal by designating priority for Section 8 subsidies to very low income families.

However, the broad range of incomes proposal remained "indefensible" because it was primarily framed as a program that denied access rather than one that provided access to the very poor. The Section 8 proposal was incorporated as an addition and not as the primary program. Because the primary message that came out of the broad range of incomes program was the denial of access, even the Section 8 proposal was rejected by advocacy groups.

Had the proposal been framed primarily as a means to integrate welfare recipients into private housing through the Section 8 program, it is not unimaginable that the same advocacy groups might have supported it. In fact, the debate would have probably been around issues of private discrimination in leased housing, with advocates arguing for the rights of welfare dependents or single mothers to have access to private housing.

55 Ibid.
Once such support was garnered, the idea of bringing the working poor (who were still considered very poor by government definition) into public housing could have been framed as giving access to affordable housing to people who needed it as much as people on welfare.
CHAPTER FIVE: CONCLUSION

The intent of this thesis has been to understand the nature of the controversy between the BHA and a coalition of advocacy groups regarding the BHA's attempt to implement an income-mixing program for its public housing developments. In regard to the nature of the controversy, the findings are as follows:

I) Opposition to the proposal was a reaction more to the way in which the BHA's proposal was framed than to the question of economic integration. The framing of the BHA's proposal as a "community needs" frame led to the justification of denying public housing access to groups of people considered to be the most in need. As a result, an emotional debate grew in which a compromise could not be realized.

II) While the substantive issue underlying the controversy was the question of who among the poor should live in public housing, the controversy was played out in a symbolic debate between the "community need" and the "needs of certain groups" for public housing.

III) Had the proposal been framed primarily as a means to integrate welfare recipients and the unemployed through increased access to private housing, it could have received support from the same groups who were opposed to the income-mixing proposal.
The thesis has argued that both the historical background of the public housing program and the political and economic climate of the early 1980s had a profound effect in shaping the conflicting views between the BHA and the advocacy groups.

Historically, the way in which the public housing program was managed meant that certain groups such as single mothers, minorities and people on welfare were unable to count on the programs initiated by policy makers in the public housing agencies. This history of discrimination set the climate for the involvement of various advocacy groups in the public housing field. The civil rights movement of the sixties led to an increase in tenant organizations and advocacy groups who challenged the practices of PHAs.

After the civil rights challenge, integration started to be seen a greater social good but the method by which it was achieved in public housing (i.e. setting quotas in order to prevent the "tipping" effect) discriminated against the same group of people it was trying to help. This method was seen as a long term solution to contribute to the greater social good but the immediate rights of the poor were sacrificed in the implementation, causing further skepticism concerning BHA policies in the eyes of the advocacy groups.

In the 1960s advocacy groups challenged the BHA's exclusionary practices and political patronage to establish new rules that increased access to public housing based on need. Public housing managers were
resistant to these new rules and changes were not carried out. By the end of the 70s, BHA faced an economic crisis due to lack of funds and, more importantly, the tenants were the poorest of all public housing residents in the country. Because of bad management and financial crisis, the BHA was put under a court appointed receivership. In the 1980s, the political and economic climate put further strain on PHAs. There were large increases in unemployment and homelessness and a drastic reduction of subsidized housing stock.

In 1983, the BHA proposed an income-mixing strategy for public housing. Based on past history, advocacy groups tended to be generally skeptical when the BHA proposed new public housing strategies. This new strategy based on the mixing of working and non-working poor was, in the BHA's view, a long term approach to create viable communities in its public housing developments. The proposal was implicitly framed as a "community needs" frame. As a result, the BHA felt that it was justified in denying public housing access to some of the very poor, unemployed, and those on welfare in the name of the social good. Advocacy groups saw this as another way of denying access to public housing for the very poor. In their view, increasing poverty and homelessness demanded that public housing be reserved for the most needy.

BHA's argument for its income-mixing strategy was organized under a "larger community needs" frame and viewed the denial of access of certain
groups as necessary in order to achieve a greater community good. In a program such as public housing where race, income and class are always central issues, a strategy that is primarily based on the denial of access, particularly to the perceived lower-class group, is one that will always create a controversy nested in an emotional and symbolic battle. This symbolic battle played itself out, with both sides using persuasive language and the same evidence to support their arguments. The controversy grew into an emotionally packed debate that had more to do with the symbolic nature of the conflict than it did with the underlying issue of who should be housed in public housing.

**Recommendation**

In order to avoid such controversies, or at least to minimize the conflict so that a chance for compromise may exist, housing and community strategies need to be designed so that all possible conflicting scenarios, and conflict management strategies be worked out ahead of time. Policy makers need to frame and formulate their proposals to insure understanding of the intent. Considering all possible conflicts can also afford the opportunity to discover any fundamental flaws inherent in the proposal. Regardless of its anticipated future virtues, it may then be better to reject the proposal rather than overlook the flaw, particularly when opposition will come from the people that the program is designed to help.
The controversy between the BHA and the advocacy groups was never resolved. The proposal was rejected by the mayor primarily for political reasons. But the process did achieve certain results. Tenants and advocacy groups realized their potential as powerful coalitions, and policy makers became more aware of the concerns and needs of the tenants themselves. In that sense, the empowerment of the tenants was achieved.
POWERS OF THE RECEIVER

It is the intention of the Court, acting pursuant to its general equity powers, to afford to the Receiver all powers and authority necessary and available to provide relief to the Plaintiff Class of Tenants. In order to fulfill his responsibilities, the Receiver shall have full power to direct, control, manage, administer and operate the property, funds and staff of the BHA, subject to future orders of the Court. The Receiver shall take all actions that are necessary or appropriate to conduct and to direct the ordinary affairs of the BHA. Without limiting the generality of the foregoing, the Receiver shall exercise all of the powers granted to or available to the Board (and shall supersede the Board) and to the Administrator of the BHA pursuant to any statute, rule, regulation, contract, agreement or grant of authority from any source of authority, and may in the exercise of the authority granted to him by the Court take the following actions:

(1) maintain, secure, protect, conserve, modernize, repair, rehabilitate, redevelop, and improve the property and assets of the BHA, and acquire and dispose of the same, subject, in the case of acquisition and disposition of real property, to applicable HUD and DCA regulations and to the prior approval of the Court;

(2) apply for and accept funds on behalf of the BHA from any public or private entity or person for any lawful purpose;

(3) contract on behalf of the BHA with any public or private entity or person for any lawful purpose or to perform, with adequate controls and monitoring, any function currently or previously performed by the BHA;

(4) take any action or execute any document necessary to comply with and implement all contracts or agreements with the United States or the Commonwealth of Massachusetts, or any agency or department acting on behalf thereof, including the United States Department of Housing and Urban Development ("HUD") and the Massachusetts Department of Community Affairs ("DCA"), or seek and obtain a waiver of any requirement or regulation contained or incorporated in any such contract or agreement;

(5) carry out all responsibilities assigned to the Board or any member thereof or other officer of the BHA under any existing resolution authorizing the sale of bonds or notes and the execution of requisition agreements in connection therewith;

(6) borrow money for the operations of the BHA and the development, redevelopment, rehabilitation, modernization, renovation, remodeling,

Source: Commonwealth of Massachusetts, Superior Court, Civil Action No. 17222 Perez v. Boston Housing Authority Order of Appointment of Receiver, February 5, 1980.
reconstruction, repair, landscaping or improvement of any development or portion thereof, subject to applicable HUD and DCA regulations and to the approval of the Court, and pay interest on such loans or debts and any debts lawfully incurred by or on behalf of the BHA before the effective date of this Order;

(7) approve corporate records of the BHA and certify actions of the BHA, by either his own signature or an authorized facsimile thereof, when necessary to take the place of minutes of the Board;

(8) approve and execute all contracts that the BHA enters into after the date of this Order;

(9) disaffirm, reject or discontinue at any time any executory or partially-executed contract, or any severable or divisible portion thereof, entered into before the date of this Order, including but not limited to employment, consultant, personal or professional services and materials contracts, when he finds that the performance of such contract or portion thereof will impose an undue burden or cost on the BHA, materially interfere with the achievement of the purposes of this Order, or otherwise not be in the best interest of the BHA;

(10) direct, supervise and oversee all officers and employees of the BHA;

(11) create, abolish and transfer positions, place positions in grades and salary levels, establish the compensation for and the duties of such positions, adopt or amend tables of organization, establish lines of authority and reporting, and otherwise recognize the structure and responsibilities of the BHA staff in such ways as he finds will best enable the BHA to carry out its functions and to achieve the purposes of this Order;

(12) hire, promote, transfer, discipline, suspend or discharge all officers and employees of the BHA, and establish systems to evaluate periodically the performance of each officer and employee and to establish and enforce standards of employee productivity;

(13) procure insurance as necessary to protect the property, assets and funds of the BHA, subject to applicable HUD and DCA regulations;

(14) file and prosecute suits or commence other legal actions in the name of and on behalf of the BHA in any appropriate state or federal court, and commence and prosecute administrative proceedings in the name of and on behalf of the BHA before any federal, state or city officer, agency or body;

(15) defend, compromise and settle any legal action or administrative proceeding to which the BHA is a party, or enter into such settlement agreement in anticipation of litigation or administrative action as he finds in the best interest of the BHA, but neither the Receiver nor the BHA shall be subject to any legal action or administrative proceeding of any nature for acts performed by the Receiver except as expressly provided in this Order;

(16) disaffirm, reject, discontinue, amend, revise, or rescind any internal rule, regulation, bylaw, policy, custom or practice of the BHA, when he finds that such action will materially improve the BHA's capacity to achieve the purposes of this Order;
Appendix A (cont.)

(17) delegate to any officer or employee of the BHA or any agent of the
Receiver any power granted to the Receiver pursuant to this Order or any
provision of the law;

(18) contract for such legal, accounting, professional or consultant
services furnished directly to the Receiver as he finds necessary for the
performance of his duties, subject to the prior approval of the Court, and
direct the BHA to pay the costs therefor;

(19) take any action that he finds necessary and proper for the achieve-
ment of the purposes of this Order or the exercise of any of the foregoing
powers.
October 25, 1983

Mr. John Mongan  
Regional Administrator  
U.S. Department of Housing  
and Urban Development  
J.F.K. Federal Building  
Boston, MA  02203  

ATTENTION: Stanley Sigel  

RE: Broad Range Of Incomes Program For The Boston Housing Authority

Dear Mr. Mongan:

I am writing to describe and request HUD authorization to proceed with BHA's proposed broad range of incomes program for its family developments.

As you know, the United States Housing Act requires housing authorities to establish tenant selection criteria "designed to assure that, within a reasonable period of time, the project will include families with a broad range of incomes and will avoid concentrations of lower income and deprived families with serious social problems..." 42 U.S.C. 1437d. The Senate Committee responsible for the act which contained this provision stated that "...the Committee expects that in the long run we would have more housing developments which are not occupied solely by the very poor... Experience has demonstrated that a cross-section of occupancy is an essential ingredient in creating economically viable housing as well as a healthy social environment..." Sen. Rept. No. 93-693, 1974 U.S. Code Congressional & Administrative News, p. 4311.

In Boston, a number of family public housing developments are occupied almost solely by the very poor. Residents of these developments are almost totally isolated from others in our society whose opportunities
and outlook give them reasonable hopes and prospects for the future. This situation reduces the chances that residents, particularly teenagers and young adults, will acquire the attitudes and opportunities needed to become successful. In addition, some of the common by-products of a lack of purpose for the present or hope for the future, notably additional crime, disorder, vandalism and disinterest in property conditions, clearly have contributed to deterioration at BHA developments and thus to the need for receivership. The concentration of very poor families at BHA developments also results in lower rent rolls and more dependence on operating subsidies.

Accordingly, BHA has developed a broad range of incomes strategy which aims at achieving, at each family development, a range of incomes within HUD's permissible low income limits. BHA's family incomes presently are concentrated at the very lowest end of HUD's permissible range--69% of households have incomes below 25% of the area median income as established by HUD in 1983. BHA, therefore, generally will establish a two-tier system, with the tiers defined by incomes reflecting 25% of the area median for each household size. The ratios for selecting applicants from each tier may differ among developments and change over time, according to the income distribution of tenants within each development, but the ultimate goal will be a 50% representation in each tier. Any priorities offered applicants as part of this program, however, will be subordinate to priorities and plans in effect for the promotion, achievement or maintenance of racial integration.

With respect to BHA's elderly developments, application of such a strategy would not have the same constructive effect, and thus, unnecessarily would result in excessive delay in meeting the housing needs of very low income elderly persons or families. Therefore, BHA requests HUD's concurrence, contemplated by the statute, that these efforts need not be applied to its elderly developments.
Recent statutory amendments and related congressional pronouncements, not yet reflected in regulations, have clarified that the broad range of incomes policy is not to result in a priority for applicants whose incomes exceed 50% of the area median. Since very few (less than 5%) of BHA's applicants have incomes which exceed this level, the proposed program will not have such an effect. Of course, BHA will comply with any future regulations on this subject.

BHA's broad range of incomes proposal could be implemented under the present language of part V.B.4. of its Tenant Selection and Assignment Plan (TSAP), previously approved by HUD, which allows special priority categories to be established for individual developments. For clarification, however, BHA proposes TSAP changes which specifically authorize such a program.

While the implementation of the broad range of incomes program is essential to the well-being of BHA's family developments, the shortage of rental housing for Boston's very low-income families obviously remains a concern. BHA's substantial efforts to rehabilitate and reoccupy its developments, which in some cases involve the rehabilitation of units which have been vacant ten years or more, will help to alleviate this situation. In addition, under separate cover the BHA is proposing changes to its Section 8 existing housing program, which will assist further by providing priority in that program for very low income and emergency applicants to public housing. Similar changes are proposed for the State's leased housing program.

The proposed TSAP language, actual broad range of incomes proposal and pertinent background data are included. Your review of this material is appreciated. Please call me immediately if you have questions or comments.

Sincerely,

Lewis Spence
Receiver/Administrator

LHS/jb

Enclosures

cc: Amy Anthony, Secretary, EOCD
    Leslie Newman, Esq., GBLS (Counsel for plaintiff class, Perez v. BHA)
    Nick Nibi, Director, Office of Housing, HUD
    Ken Salk, Director, Housing Management, HUD
    James Hamrock, Chief of Assisted Housing Management Branch, HUD
    Joseph Vera, Acting Director, Regional Office of FHEO, HUD
Sincerely,

Kenneth H. Salk, Director
Housing Management Division
Appendix D

BOSTON HOUSING AUTHORITY
52 Chauncy Street
Boston, Massachusetts 02111

April 23, 1984

Mr. Langley Keyes
Executive Office of Communities
and Development
100 Cambridge Street
Boston, MA

Dear Lang:

Enclosed are two tables which indicate the success rates for Section 8 Certificate holders:

1) By race and income source; and
2) By race and unit size.

The data is, I hope, self-explanatory. You will note that there does not appear to be any bias against AFDC recipients in finding units. In fact, AFDC recipients have a higher success rate than do employed Certificate holders.

You will note, however, that SSI recipients have the lowest success rate of any of the income source groups. This is not surprising to me in light of the special problems associated with SSI recipients. Regarding bedroom size, somewhat surprisingly, there is not a really clear pattern evident in the data. In fact, I initially believed that these statistics were incorrect, simply on the basis that 4-bedroom white families have a higher success rate than 1-bedroom white families. However, we have rechecked all of the numbers and I believe they are accurate.

Please let me know if you need any clarification or additional information. We very much appreciated the forum which you provided for the BHA to explain the broad range of incomes policy and are hopeful that EOCD approval will be forthcoming.

Sincerely,

John Washek
Executive Assistant to the Receiver

JW/jm
Attachments
cc: Lewis H. Spence, Receiver/Administrator

Rod Solomon, General Counsel

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Appendix D (cont.)

TABLE I

DISTRIBUTION OF SECTION 8 CERTIFICATE HOLDERS
BY RACE AND INCOME SOURCE
(SUCCESS RATES ARE INDICATED IN PARENTHESES)

<table>
<thead>
<tr>
<th>Income Source</th>
<th>White</th>
<th>Black</th>
<th>Hispanic</th>
<th>Other</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>(%)</td>
<td>(%)</td>
<td>(%)</td>
<td>(%)</td>
<td>(%)</td>
</tr>
<tr>
<td>AFDC</td>
<td>340</td>
<td>1659</td>
<td>457</td>
<td>20</td>
<td>2476</td>
</tr>
<tr>
<td></td>
<td>(64%)</td>
<td>(59%)</td>
<td>(65%)</td>
<td>(35%)</td>
<td>(61%)</td>
</tr>
<tr>
<td>Employed</td>
<td>159</td>
<td>947</td>
<td>121</td>
<td>51</td>
<td>1278</td>
</tr>
<tr>
<td></td>
<td>(52%)</td>
<td>(58%)</td>
<td>(60%)</td>
<td>(37%)</td>
<td>(56%)</td>
</tr>
<tr>
<td>Soc.Sec./Retired</td>
<td>350</td>
<td>110</td>
<td>12</td>
<td>12</td>
<td>484</td>
</tr>
<tr>
<td></td>
<td>(50%)</td>
<td>(56%)</td>
<td>(33%)</td>
<td>(67%)</td>
<td>(52%)</td>
</tr>
<tr>
<td>SSI</td>
<td>103</td>
<td>72</td>
<td>28</td>
<td>2</td>
<td>205</td>
</tr>
<tr>
<td></td>
<td>(42%)</td>
<td>(43%)</td>
<td>(64%)</td>
<td>(50%)</td>
<td>(45%)</td>
</tr>
<tr>
<td>General Relief</td>
<td>24</td>
<td>70</td>
<td>14</td>
<td>2</td>
<td>110</td>
</tr>
<tr>
<td></td>
<td>(42%)</td>
<td>(69%)</td>
<td>(43%)</td>
<td>(50%)</td>
<td>(59%)</td>
</tr>
<tr>
<td>Multi Source</td>
<td>451</td>
<td>473</td>
<td>124</td>
<td>20</td>
<td>1068</td>
</tr>
<tr>
<td></td>
<td>(57%)</td>
<td>(54%)</td>
<td>(61%)</td>
<td>(45%)</td>
<td>(56%)</td>
</tr>
<tr>
<td>Other</td>
<td>41</td>
<td>181</td>
<td>12</td>
<td>2</td>
<td>236</td>
</tr>
<tr>
<td></td>
<td>(71%)</td>
<td>(86%)</td>
<td>(50%)</td>
<td>(100%)</td>
<td>(82%)</td>
</tr>
<tr>
<td>Total</td>
<td>1468</td>
<td>3512</td>
<td>768</td>
<td>109</td>
<td>5857</td>
</tr>
<tr>
<td></td>
<td>(56%)</td>
<td>(59%)</td>
<td>(62%)</td>
<td>(43%)</td>
<td>(59%)</td>
</tr>
</tbody>
</table>
DISTRIBUTION OF SECTION 8 CERTIFICATE HOLDERS
BY RACE AND UNIT SIZE
(SUCCESS RATES ARE INDICATED IN PARENTHESES)

<table>
<thead>
<tr>
<th>Unit Size</th>
<th>White (success rate)</th>
<th>Black (success rate)</th>
<th>Hispanic (success rate)</th>
<th>Other (success rate)</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>0-1</td>
<td>722 (50%)</td>
<td>261 (65%)</td>
<td>34 (53%)</td>
<td>20 (70%)</td>
<td>1037</td>
</tr>
<tr>
<td>2</td>
<td>456 (60%)</td>
<td>1626 (61%)</td>
<td>261 (61%)</td>
<td>35 (42%)</td>
<td>2378</td>
</tr>
<tr>
<td>3</td>
<td>235 (64%)</td>
<td>1226 (59%)</td>
<td>335 (64%)</td>
<td>40 (28%)</td>
<td>1835</td>
</tr>
<tr>
<td>4+</td>
<td>55 (55%)</td>
<td>399 (51%)</td>
<td>138 (61%)</td>
<td>15 (47%)</td>
<td>607</td>
</tr>
<tr>
<td>Total</td>
<td>1468 (56%)</td>
<td>3512 (59%)</td>
<td>768 (62%)</td>
<td>109 (43%)</td>
<td>5857</td>
</tr>
</tbody>
</table>
May 14, 1984

Lewis H. Spence  
Receiver/Administrator  
Boston Housing Authority  
52 Chauncy Street  
Boston, MA 02111

Re: Proposal for "Broad Range of Incomes" Program

Dear Mr. Spence:

I am writing in regard to the proposal made by the Boston Housing Authority to implement a "Broad Range of Incomes" program in the Authority's family public housing developments.

It is my understanding that the Authority proposes these changes and has submitted them to us for our approval based upon several considerations:

-- The Authority has concluded that occupancy at several of its family developments almost solely by very poor households is not a desirable long-term situation and that the Authority should adopt a policy promoting a "Broad Range of Incomes" within its public housing developments.

-- The Authority has received approval from the U.S. Department of Housing and Urban Development to implement such a "Broad Range of Incomes" program in its federal family public housing developments (which constitutes 79% of the total units in all the BHA's family public housing developments).

-- At the same time, the Authority intends to amend its tenant selection procedures under its rental assistance programs to provide priority to those of very low income and to emergency situations; approval for such a change under the federal rental assistance program (Section 8) has already been obtained from HUD.
The Authority believes that it can work to ensure an acceptable success rate in the utilization of its rental assistance programs for those of very low income (particularly, large families); recent experience at the BHA indicates that potentially vulnerable groups (low income, families on AFDC, large families, or minorities) have success rates equal to or better than the total pool of eligible applicants.

EOCD has serious concerns about the potential impact of the BHA proposal. While the "Broad Range of Incomes" program might improve certain aspects of the public housing developments involved, it is critical that such a policy not discriminate against very low income applicants to the BHA, particularly welfare recipients.

Based upon your presentation, however, we have concluded that your proposed policy could be implemented so as not to adversely affect those low income applicants to the Boston Housing Authority, provided that certain actions are taken by the BHA. EOCD's approval therefore is conditional upon the following:

1. The establishment of a priority system for very low income households for the Section 8 and Chapter 707 rental assistance programs, with clear guidelines as to how the specific mechanics of such a system would work and how it is to be made compatible with other priorities (such as emergency status) and waiting lists.

2. Development of a program to provide support and assistance for households granted a Section 8 or Chapter 707 certificates in finding an apartment, so as to ensure successful utilization of these programs.

3. Development of a plan, submitted to EOCD, for the development of Chapter 705 and Chapter 689 housing which demonstrates the use of those programs by the BHA to increase the overall stock of public housing for large families and households with special needs.

EOCD approves the proposed change at such time as the BHA certifies that it is in compliance with the above conditions, as follows:

1. The proposed amendment to the TSAP regarding Section XVII, "Broad Range of Income Criteria" shall include a sentence which reads: "Such criteria, insofar as they relate to state-aided developments, shall be subject to the review and approval of Executive Office of Communities and Development."
Appendix E (cont.)

Lewis H. Spence
Receiver/Administrator
Page 3
May 14, 1984

(2) EOCD is willing to approve the proposed "criteria" outlined in the BHA's Proposal for a "Broad Range of Income" program (included in your letter of October 25, 1983), with the following addition:

"(10) The BHA will monitor the impact of the broad range of incomes program, particularly with regard to potentially vulnerable groups (AFDC recipients, large families, minorities), and will report regularly (at least quarterly) to EOCD as to what those impacts are. If at any time there is an indication that potentially vulnerable groups are suffering substantially adverse impacts as a result of the implementation of the broad range of incomes program, EOCD may require modifications to such program."

In addition, while not a condition of our approval, EOCD urges that the BHA: (1) develop a timetable for implementation of the "Broad Range of Incomes" program which considers equity issues towards those who have been on the waiting list for years and for whom the abrupt imposition of a 2 to 1 ratio precludes the likelihood of access to a BHA development, recognizing the need to develop a careful process and timetable for transition from the old system to the new one; and (2) develop a priority system for Tier II households which gives recognition and weighting to families that have moved off of public assistance programs and into jobs (particularly as a result of involvement in publicly-sponsored employment or training programs.)

It is our hope that the BHA will be able to develop and implement a "Broad Range of Incomes" program which, in conjunction with other actions to be taken by the Authority, will not adversely impact very low income applicants to the Authority.

Sincerely,

Amy S. Anthony
Secretary

81
May 29, 1984

Secretary Amy Anthony  
Executive Office of Communities and Development  
100 Cambridge St.  
Boston, MA 02202

Dear Secretary Anthony:

It is my understanding that the Boston Housing Authority (BHA) is requesting changes in the tenant selection regulations to allow income to be used as a criterion for selecting eligible tenants. Currently, the BHA policy is based on eligible residents receiving priority based upon date of application, with certain exceptions (e.g. emergencies, racial balance). The proposed policy would change this policy in order to create a broader range of household incomes.

My Administration is committed to developing a comprehensive approach to providing new housing options for low- and moderate-income households, while at the same time affording protections to current residents against displacement and poor living conditions. In terms of the Administration's commitment to public housing residents, we are committed to providing adequate city services to BHA residents and supporting in any way possible the efforts of the Receiver, so we may begin an orderly transition process of responsibility back to the City.

In light of the current housing crisis in the City, particularly as it impacts on low-income residents, I find it difficult to support the proposed BHA tenant selection policy. As you know, there is a severe housing shortage in the City, particularly for low-income residents. The current BHA waiting list of over 6,000 eligible families is an indication of the severity of the problem in the private housing market.
Letter to Secretary Amy Anthony  
May 29, 1984  
Page Two

When the housing supply in the City is expanded and can provide more access and opportunities for the very low-income population, the proposed BHA policy may be a viable option. But under current housing conditions, I believe that such a policy may not best serve the interests of both low-income people and the broader community. While I understand the reasoning that went into the design of this policy, especially the desire to seek stability in public housing communities by serving a more diverse population, I believe that this can be accomplished best through other means. Specifically, I would hope to see expanded job-training and employment opportunities for current public housing residents. I applaud and strongly support efforts to increase support services in the area of education, training, employment, and community-building activities which have been a major part of rebuilding public housing in our City.

Perhaps it would be possible to work out some "pilot" program to test the potential benefits of BHA income-mixing in one or two developments. I am certain that the Receiver can develop an innovative plan that would allow such a test of the proposed policy without jeopardizing the housing opportunities for very low-income people.

The task of serving the housing needs of our neediest citizens is indeed a difficult one. I believe that, working together, we can achieve the goals of increasing the housing supply and providing greater economic opportunities for public housing residents, without depriving the neediest of scarce housing resources. Thank you for your attention to this important concern.

Sincerely,

Raymond L. Flynn  
Mayor

RLF/dp 0214D
May 29, 1984

Lewis H. Spence
Receiver/Administrator
Boston Housing Authority
52 Chauncy Street
Boston, MA 02111

Dear Mr. Spence:

As a housing advocate working primarily with homeless and near-homeless individuals and families who receive public assistance as their sole source of income, I have grave misgivings regarding the recently approved BHA tenant selection policy change. I feel that the impact of this change upon the very low income members of the community has not been adequately assessed.

I feel that the information provided by the BHA (in a letter to the Executive Office of Communities and Development, from John Washek) gives an incomplete picture of the problems faced by Section 8 certificate holders, particularly those who are public assistance recipients. I have looked at Mr. Washek's data in terms of the number of certificate holders who fail to find housing, and I am very troubled by the large number of unsuccessful AFDC recipients, particularly those who are black and Hispanic. According to Mr. Washek's figures, there are six times as many black AFDC certificate holders as white AFDC certificate holders who failed to find housing in the Section 8 program. Disregarding race, one-and-a-half times as many AFDC Section 8's failed to find housing than did employed Section 8's.

Moreover, the Boston Fair Housing Commission found that far more black Section 8 certificate holders failed to find housing than did white Section 8 certificate holders. According to the Commission report, there were 3842 more blacks than whites who failed to find housing under the Section 8 program.

It is critical that any modification in the distribution of public housing units and Section 8 certificates should consider the above outlined problems. A Section 8 certificate, unlike a place in public housing, is not a guarantee of shelter. For some groups, there is even less certainty. I believe that the information BHA has provided has not indicated these problems to the extent that is warranted. I hope that the attached analysis remedies this situation in part.

Sincerely,

Sue Marsh
Housing Advocate
## INCOME MIX -- SECTION 8 FAILURES

<table>
<thead>
<tr>
<th>Certificate holder</th>
<th>Success rate</th>
<th>Number of failures</th>
</tr>
</thead>
<tbody>
<tr>
<td>AFDC - white</td>
<td>64%</td>
<td>191</td>
</tr>
<tr>
<td>AFDC - black</td>
<td>59%</td>
<td>1153</td>
</tr>
<tr>
<td>AFDC - Hispanic</td>
<td>65%</td>
<td>246</td>
</tr>
<tr>
<td>AFDC - other</td>
<td>35%</td>
<td>37</td>
</tr>
<tr>
<td>employed - white</td>
<td>52%</td>
<td>146</td>
</tr>
<tr>
<td>employed - black</td>
<td>58%</td>
<td>685</td>
</tr>
<tr>
<td>employed - Hispanic</td>
<td>60%</td>
<td>30</td>
</tr>
<tr>
<td>employed - other</td>
<td>37%</td>
<td>86</td>
</tr>
<tr>
<td>AFDC - total</td>
<td>61%</td>
<td>1427</td>
</tr>
<tr>
<td>employed - total</td>
<td>56%</td>
<td>997</td>
</tr>
</tbody>
</table>
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