

## **Comment on Lawrence J. Vale's "Beyond the Problem Projects Paradigm: Defining and Revitalizing 'Severely Distressed' Public Housing"**

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### **Introduction**

In his article "Beyond the Problem Projects Paradigm: Defining and Revitalizing 'Severely Distressed' Public Housing," Lawrence Vale reviews research conducted by the National Commission on Severely Distressed Public Housing (NCSDPH) and comments on the recommendations that are included in its *Final Report*, presented to Congress and the Secretary of Housing and Urban Development (HUD) on August 10, 1992 (NCSDPH 1992b). In his article, Vale makes several comments regarding the condition of severely distressed public housing and offers certain criticisms of the research conducted by NCSDPH including that of the consulting team of which he was a member. This comment will review some of the major criticisms offered by Vale and will discuss various components of NCSDPH's research and findings.

### **The National Commission on Severely Distressed Public Housing**

Congress established NCSDPH through the 1989 Housing and Urban Development Reform Act (Public Law 101-235). NCSDPH was assigned the following tasks:

1. To identify those public housing developments in the nation that are in a severe state of distress
2. To assess the most promising strategies that have been implemented by public housing authorities and other government agencies to improve the conditions of severe distress
3. To develop a national action plan eliminating the conditions that contribute to unfit living conditions in severely distressed public housing developments by the year 2000

In fulfilling this mandate by Congress, NCSDPH conducted an extensive survey of conditions at severely distressed public housing developments across the country. Its evaluation of severely distressed public housing involved several forms of research, including the following procedures:

1. Analysis of physical needs databases, including the national study of modernization needs conducted by Abt Associates (Cambridge, MA) and the accrual analysis conducted by ICF, Inc. (Fairfax, VA)
2. Collection of data on the resident population from HUD
3. Examination of HUD's treatment of troubled public housing agencies (PHAs) and developments needing rehabilitation
4. Solicitation of comments and examples of severely distressed public housing from industry trade groups
5. Conduct of case studies at 14 developments of 12 public housing agencies around the country that examined conditions at both distressed and revitalized developments

While conducting their research, commissioners visited 25 cities, held more than 20 public hearings, talked to numerous public housing residents, and interviewed PHA staff.

## **Background of the NCSDPH research**

In writing this article, Vale has provided an important service to the public housing community by furthering discussion of NCSDPH's recommendations and by assessing areas that NCSDPH believed required additional study and analysis. In fact, he indicates that consultants for and members of NCSDPH complained about the lack of data and the general unavailability of national statistics on certain existing programs that were designed to treat (on a limited scale) severely distressed public housing developments (e.g., the Major Rehabilitation of Obsolete Properties Program known as MROP). Unlike other commissions or similar organizations studying public housing, NCSDPH attempted to conduct a detailed review of existing data and to recommend further studies and research along with new program initiatives. NCSDPH felt additional research was needed to better assess the root causes of severely distressed public housing

and to measure the effectiveness of current and proposed program initiatives.

The lack of hard data did not dissuade the commissioners. Instead, under the direction of TAG Associates, NCSDPH launched an ambitious program conducting research in core areas of public housing operations such as housing management, social support programs, capital improvements, performance standards, planning, and resident initiatives. Items covered by these core areas included delivery of maintenance services, security programs, housing redevelopment, occupancy, resident management, housing viability assessment, and the effects of existing laws and regulations on the administration of public housing. This research was supplemented by public testimony and site visits to PHAs and troubled public housing developments. NCSDPH also conducted a series of case studies providing research on selected aspects of public housing in 12 cities. Most of the case study research focused on currently severely distressed public housing developments or developments that were formerly considered to be severely distressed but had been revitalized. This research was intended to help address the significant lack of data on severely distressed public housing (and, in many respects, on the entire public housing program) and to provide information on which to base the rather sweeping recommendations contained in the *Final Report*.

Until recently, the research referred to in the *Final Report* and cited by Vale is the only information that has been available for examination. However, HUD has released to the public the "Case Study and Site Examination Reports" (NCSDPH 1993) and will soon release the "Working Papers on Identifying and Addressing Severely Distressed Public Housing" (NCSDPH 1992c). The working papers contain 10 chapters and four appendices, and the case studies comprise 14 chapters with detailed information on 13 separate field studies. Together, both documents consist of approximately 900 pages of text, tables, and illustrations, and they serve as the research and analysis supporting the National Action Plan presented in the *Final Report*. Vale's major contribution to this research was in the area of public housing occupancy and can be found in appendix A of the working papers under "Occupancy Issues in Distressed Public Housing." The data presented in this report were used extensively to support other analyses and recommendations developed by NCSDPH. In fact, the *Final Report* indicated that the "research of the Commission was so extensive that all documents could not be included

in the Report. However, the Commission feels that the information gathered, particularly the case studies, is of such significance to the public housing industry that it is currently preparing the case studies so that they can be disseminated..." (NCSDPH 1992b, XIV). As already indicated, the case studies have been released and other documents are due to be published through the Office of the Secretary of HUD.

In addition to this extensive research, NCSDPH developed specific action steps to conduct further research and analysis providing additional data on public housing. In response to criticisms made by HUD on NCSDPH's "Preliminary Report and Proposed National Action Plan" (NCSDPH 1992a) issued for public comment on June 1, 1992, NCSDPH stated its belief "that data and information on public housing and severely distressed public housing is essential in order to conduct planning and to identify solutions. It is unreasonable for the public housing industry to go into the next century without essential information concerning its public housing stock" (Lane 1992; NCSDPH 1992a). Therefore, despite its extensive research and analysis, NCSDPH recognized the need for further research and programs for the actual collection and maintenance of data on critical aspects of the public housing program. NCSDPH even called for a separate unit to be created within HUD to manage the efforts undertaken nationally to address conditions in severely distressed public housing, including the maintenance of research data and other information.

### **Portion of public housing stock considered severely distressed**

As Vale points out in his article, there is absolutely no question that public housing residents overall are poor and getting poorer. This point has not been made more clearly than in the NCSDPH research. As a part of the work program for NCSDPH, a study was conducted on trends in public housing occupancy. This study relied strongly on HUD data as well as the contributions of the Council of Large Public Housing Authorities. The need for this research was highlighted by findings made during the case study research that showed that household income was not increasing at the expected rate (defined by HUD as approximately 6 percent per year) and was actually declining in some of the large PHAs. The two factors

that seemed to have the strongest effect on this trend were the implementation of federal preferences imposed by Congress in 1981 and the steady departure of higher income households.

In chapter 3 of NCSDPH's working papers, it is stated that "a key finding of the NCSDPH's research is that the majority of public housing residents are poor and getting poorer, whether or not they live in public housing that is judged to be 'severely distressed.'" In most PHAs, the average household income of residents has been declining since the mid-1980s. Chapter 3 also reveals that data on resident characteristics included in the national study of modernization needs indicate that, in a number of instances, the characteristics of households residing in public housing family developments are becoming more similar. It was clear that when issues of household distress and poverty were considered, no single factor could generally be used to determine severe distress. NCSDPH felt that the residents of these housing developments are often isolated from the greater community and are less likely to be in a position to receive needed support services, even when such services may be generally available in a locality. Frequently the isolation and poverty, along with other factors, create conditions of severe distress. Moreover, these conditions—along with the overall isolation that NCSDPH termed "institutional abandonment"—make it more difficult for PHAs to treat severe distress.

Vale acknowledges these worst-case developments, but he cautions against overreliance on a problem projects paradigm that could block calls for system wide reforms. He does not seem to acknowledge the importance of directing attention to these developments as a method for undertaking new programs and initiatives that could benefit the entire public housing program. The very existence of these housing developments strongly supports the need for more effective approaches and highlights problems with the lack of data on the socioeconomic and other aspects of the public housing program. Further, by observing the effectiveness of a strong public investment going beyond the physical boundaries of the housing development, one can make the case for applying certain of these programs and approaches to other nonseverely distressed public housing developments.

The commissioners were aware that public housing is not an entitlement program and did not advocate that it should be. NCSDPH noted that there was a growing need for housing people other than very low-income households, including the working poor. The 1990 census was noted with regard to the change in the characteristics

of working households. For instance, the fact that nearly one in five Americans who worked full-time did not make enough money at the end of the 1980s to keep a family of four out of poverty was cited, as well as that this number was up sharply from the 1970s. The commissioners used this information to help formulate the recommendations calling for a greater income mix in public housing to provide housing opportunities for the working poor and to provide a greater mix of households, and (it is hoped) stronger communities, in public housing. The Lake Parc Place public housing development in Chicago, which is operated as part of the demonstration program called Mixed Income New Community Strategies (MINCS), was reviewed by NCSDPH; it was used as an example of achieving an income mix to treat distress in public housing. Overall, it is important to note that NCSDPH looked at these and other issues as they affected the public housing program as a whole, while focusing (as mandated by Congress) on severely distressed public housing. In many respects, certain commissioners intended to provide a basis for extending some of their proposals and other recommendations from the proposals for severely distressed public housing to other parts of the public housing program.

Vale feels that if special attention is paid to the devastation in the worst-case developments, the balance of funds for the remaining stock may be seen as increasingly inadequate. This is one of the reasons to have a separate program encompassing more than just physical rehabilitation. Many sources in public housing informed NCSDPH that the existence of these developments tended to result in diverting operating resources from other more stable developments. The resources being directed to severely distressed public housing are desperately needed for the delivery of essential operating services to sustain nonseverely distressed public housing. Therefore, a separate program for severely distressed public housing will likely improve the level of resources available for nonseverely distressed developments instead of, as Vale contends, detracting from efforts to serve this larger portion of the public housing program.

However one defines severely distressed public housing, it should be clear to most people in the public housing industry that severely distressed public housing developments are significantly different from most of the public housing stock and require a separate focus and treatment. In the *Final Report*, it was noted that because approximately 94 percent of the housing stock did not appear to be severely distressed, some of the programs and

approaches (certainly not all) should not be confused with or woven into programs and approaches for addressing the needs of the remainder of the public housing stock that does not require such treatment. It seemed that NCSDPH should be restricting its definition to a small number of problem high-rise housing developments that were highly visible and caused public concern about the viability or effectiveness of the public housing program. NCSDPH wanted to emphasize that most public housing developments did not require extensive treatment on the scale suggested by many of its recommendations. Nevertheless, NCSDPH felt the problem of severely distressed public housing was not limited to just a handful of developments. The initial selection of severely distressed public housing was based on the number of housing units in the category of high-modernization-needs developments that are defined as those developments in the HUD database (reviewed and updated by ICF for NCSDPH) that had modernization needs at or above 60 percent of total development cost.

The estimate that 6 percent of all units are located in severely distressed developments was based on the fact that 86,000 of approximately 1.4 million units had high needs for modernization. Most of the units were assumed to be located in family public housing developments, and a few in elderly public housing developments. Therefore, it is felt that the percent of public housing developments considered severely distressed would be higher among family developments than among developments that house substantial numbers of households headed by elderly persons. The commissioners did express a concern over the inability of PHAs to reserve public housing developments for the elderly and recommended that such a change would promote more stable public housing developments for elderly households.

In looking at the modernization needs data, it seemed that the capital improvement needs of public housing had grown to nearly \$30 billion, not including a full assessment of the costs of meeting all requirements under Section 504 for handicapped households. Evidence from the research revealed that the number of high-needs housing developments was growing and would continue to grow without significant additional funding and a process for treating severely distressed public housing. Moreover, the evidence indicated that some PHAs were being forced to limit their support for severely distressed public housing (i.e., triage) by directing funds toward developments that were not severely distressed, because the severely distressed developments could drain limited funds without having a

significant lasting impact. For these reasons, it was important for NCSDPH to call for a separate program for treating severely distressed public housing and to point out clearly the full funding needs of the entire public housing program.

Vale suggests that NCSDPH did not go far enough to point out the capital improvement needs of the public housing stock as a whole, which it did. First, NCSDPH conducted the research necessary to update the estimate of full modernization needs and included capital improvements that were not included in the earlier HUD-funded study. Second, it presented the full study in its working papers and a detailed analysis of the findings in appendix B on physical needs (NCSDPH 1992c). Therefore, the presentation of the estimates for addressing the physical needs of severely distressed public housing was performed in the context of the needs of the entire public housing program.

Despite Vale's concern about diverting attention away from the broad needs of public housing and despite NCSDPH's limited mandate, there was clearly no attempt to present information for addressing the needs of severely distressed public housing at the expense of all other public housing developments. To the contrary, through the recommendations in the Final Report there was an attempt to provide substantial additional funding for severely distressed public housing so that funds allocated for all other public housing developments would not be limited by the treatment of the developments with very high needs. Further, in the working papers a concern was expressed over the capacity of PHAs and HUD to undertake short-term, large-scale treatment of severely distressed public housing developments. This need to address the time and other constraints required for addressing severely distressed public housing resulted in NCSDPH's recommendations for funding treatment programs over 10 years. This approach would allow PHAs and HUD to continue directing significant attention and funding to other public housing developments not identified as severely distressed, while HUD implemented program initiatives required by NCSDPH.

### **Defining severely distressed public housing and its causes**

NCSDPH attempted a process that would finally focus on the identification of causes and the development of solutions

rather than simply rehashing symptoms. The public testimony, case studies, and related research formed the foundation of NCSDPH's efforts to identify the causes of severely distressed public housing. The conditions found in severely distressed public housing frequently seemed to be related to conditions in the neighborhoods in which these housing developments were located. Although some of the HUD-funded research and data did not indicate this, the research and site visits seemed to emphasize a strong relationship between conditions of distress in public housing developments and those of their neighborhoods. For this reason, recommendations were developed providing for more full-scale revitalization efforts. These efforts would include community-wide participation and incentives for undertaking revitalization activities supporting redevelopment efforts within the affected public housing developments.

Although Vale acknowledges that NCSDPH did take steps to analyze the roots of distress, he contends that sufficient attention was not given to the problems faced by a system that must absorb the frustrations of poverty without the resources to help the impoverished themselves. To refute this contention, one need only look at NCSDPH's recommendations that attention be given by the White House and virtually every major government agency to severely distressed public housing and especially to the residents' need for social support services. NCSDPH indicated that severely distressed public housing had as much to do with severely distressed residents as it did with the physical needs of the housing developments. A significant number of recommendations dealt with addressing the needs of residents and indicated that any program to treat these developments must go beyond just bricks and mortar.

### *Categories of distress*

NCSDPH initially attempted to develop a strictly qualitative definition of severely distressed public housing but later chose a more quantitative definition, even though there were problems with this approach because of the significant lack of data. Evidence from the research suggested that indicators of distress could be grouped into the following four categories:

1. Physical deterioration of buildings
2. Crime in developments and their surrounding neighborhoods

3. Families living in distress
4. Severe management deficiencies and manageability problems

A brief summary of each of these categories follows. A more detailed discussion of the categories for identifying severely distressed public housing can be found in NCSDPH's working papers.

*Physical deterioration of buildings.* For many, severely distressed public housing is most immediately recognizable by physically deteriorated buildings. A building's inability to serve or function as a residential facility can be caused by deferred maintenance, obsolescence or physical deterioration of major building systems, flaws in original design, or high physical concentration (density of units on the site) that can make the development difficult to manage. The presence of high-rises was investigated as a part of the case study research; it includes a separate section on successful high-rise living in New York City public housing as well as an examination of successful severely distressed public housing treatment programs in Chicago and in Albany, NY. It is important to recognize that there are many severely distressed housing developments that do not consist of high-rise buildings.

*Crime in developments and surrounding neighborhoods.* Resident safety and security was the most commonly identified concern throughout the field work conducted by NCSDPH. It was noted that not all categories of crime need to be considered as indicators of distress. Crimes that affect residents' safety and feeling of security, such as violent crimes, property crimes, and drug crimes, were considered to have the strongest effect on whether residents felt their housing developments were severely distressed or otherwise unsafe. Regarding causes of crime, NCSDPH again noted that issues of crime should be considered in the context of the overall neighborhood so that appropriate corrective actions could be taken to improve the security of public housing residents. For example, if security is seen as being threatened by criminal activity in the overall neighborhood, then strategies must consider addressing the spillover of crime into the public housing development.

NCSDPH was well aware that the issues pertaining to crime, drugs, and safety of public housing residents affected a significant number of public housing developments, including those that would probably not be identified as severely distressed

public housing. NCSDPH even offered a separate recommendation for funding security efforts in severely distressed public housing and indicated that the recommended amount should be in addition to the amounts appropriated under the Public Housing Drug Elimination Program.

*Families living in distress.* Conditions of socioeconomic distress were also observed as indicators of severe distress at public housing developments. In fact, NCSDPH noted that “the residents of severely distressed public housing are also severely distressed and that the service needs of these households are extensive” (NCSDPH 1992a, 10). In the examination of resident initiatives and needs, public hearings and forums were held and town meetings were conducted via satellite to discuss NCSDPH’s preliminary findings and recommendations. Issues of resident needs also were included in other aspects of the research; a major chapter of the working papers is directed toward these issues. The issues of resident needs and residents in distress was so important that chapter 2 of the *Final Report* covered resident initiatives and support services, and the first component of the National Action Plan covered actions to address resident needs.

*Barriers to management.* The category of barriers to managing the environment deals with the issues pertaining to the management and manageability of these housing developments. Two full chapters of both the *Final Report* and the working papers deal with issues pertaining to housing management. The research attempted to investigate cases resulting in the inability to effectively manage severely distressed public housing, such as lack of funding, lack of management capacity, high social support needs of some residents, and major physical needs. The NCSDPH reports discuss management performance extensively and call for a national system of accreditation based on qualitative measures of housing management. Such a system is recommended because the use of quantitative measures alone does not effectively measure management effectiveness for all types of housing developments or PHAs.

Despite the effort to use a quantitative method for measuring severe distress, NCSDPH recognized that its measures and the unavailability of data may make the proposed definition difficult to implement. Public comments received by NCSDPH criticized the proposed definition, and even members of the NCSDPH and its consultants criticized the definition as Vale does in his article. However, such a definition could prompt efforts to better define

the categories of distress and to collect data to improve the ability of PHAs and HUD to identify severely distressed public housing. It is interesting to note that one industry group felt the definition as proposed would result in less than 6 percent of the public housing stock being classified as severely distressed, and that HUD and another major industry group felt it would result in more than 6 percent being classified as severely distressed. Most, if not all, of the commissioners, staff, and corporate consultants associated with NCSDPH believed that the definition would likely result in more than 6 percent of the units being classified as severely distressed.

In another effort to address problems in developing an operational definition of severely distressed public housing, NCSDPH conducted further studies on the indicators for families living in distress and rates of serious crime. These critiques point out significant problems in developing any measures in these areas; the summaries of the analyses of the two categories are included in the appendices in the working papers. Hence the consultants to NCSDPH were actually the first to criticize the definition of severe distress and to offer written critiques of the definition.

Finally, objective 2 in the National Action Plan section dealing with other strategies suggests undertaking a study and developing a process for addressing the serious lack of data on public housing in general and on severely distressed public housing specifically. Three steps for addressing this problem are contained in the National Action Plan, and \$2.5 million is recommended for HUD's Office of Policy Development and Research to carry out these steps. The amount recommended is more than was expended by the entire NCSDPH for all of its activities.

### **Resources to support public housing and to treat severely distressed developments**

In an effort to avoid some of the concerns expressed by Vale, to ensure that adequate resources were made available to treat severely distressed public housing, and to keep these treatment programs from detracting from the effective management and modernization of other public housing units, NCSDPH made several recommendations for additional funding. Further, it was felt that the public housing program would be better served by providing incentives for PHAs to identify specific housing

developments on their own and then to present local programs for treating the causes of severely distressed public housing, rather than have NCSDPH or HUD identify individual public housing developments as being severely distressed. A discussion of major recommendations for funding follows.

There is a strong necessity to address problems relating to the social support service needs of public housing residents. The NCSDPH recommendations focused on several important areas, including resident participation in programs for treating severely distressed public housing and programs better directing existing resources toward the needs of severely distressed public housing. Several of these recommendations were developed by public housing residents. Vale suggests that there was little effort to survey residents. In fact, NCSDPH conducted a resident survey, held resident roundtables, and held a national teleconference with residents. In addition, commissioners took site tours of public housing developments and heard public testimony from residents. Moreover, three of the commissioners are themselves public housing residents.

Among other recommendations, funding was proposed to support the development of a new expense level for severely distressed public housing encompassing the needed costs of social support and other housing management services. A major concern was that these developments were consuming a large share of operating funding, affecting the funds being made available for other nondistressed housing developments in the PHA public housing portfolio. Many individuals approached NCSDPH with concerns over the level of funding provided to operate public housing. Accordingly, the research indicated this was a problem for PHAs and the recommendation for additional funding to support operating services was made.

In addition to the funding recommended above, there was a strong interest in providing further financial support for security and for a host of management improvement initiatives. Because management is defined by NCSDPH as including resident initiatives, this funding would be available to support social services, resident programs, and other activities designed to increase the delivery of essential operating services that help treat severely distressed public housing. It was proposed that security programs be funded at \$93 million per year and that management improvements be funded at \$130 million per year. The funding for these programs would in all likelihood enhance the management of nondistressed public housing, because it would reduce any drain

of resources resulting from a housing organization's attempt to address conditions in severely distressed public housing solely with existing funds.

As has been discussed, NCSDPH's research indicates that public housing developments and their immediate surroundings are closely linked. Economic conditions, crime rates, drug trafficking, and activities conducted by social agencies and institutions all affect the public housing development and the surrounding neighborhood. (The surrounding neighborhood is the area immediately adjacent to public housing developments containing private market housing or property owned by an entity other than a PHA. In some cases, the surrounding neighborhood may be other public housing developments.) As a result, NCSDPH felt treatment programs often need to include efforts to address conditions in the overall neighborhood. As a result of this research, it was proposed that \$10 million per year be allocated for incentives to local governments in order to encourage their participation in overall redevelopment programs for severely distressed public housing. This participation is expected to include efforts to improve conditions in the overall neighborhood in which the public housing development is located.

Vale makes an excellent point when he asks, "Does it really make sense, for example, to consider a public housing development successfully 'turned around' when more than 90 percent of its residents still regard drugs at the development as a major problem?" Programs that treat public housing developments in isolation from their surrounding neighborhoods and do not focus on building a stable public housing community cannot result in a successful revitalization effort. NCSDPH recognized this problem and considered the needs for comprehensive treatment that did not ignore the environment (or neighborhood) in which the public housing development was located.

The program for the overall physical revitalization of severely distressed public housing calls for a total of \$7.5 billion to be appropriated over 10 years. It is important to note that of this amount, \$5.6 billion is based on the estimated amounts derived from the updated estimates presented in the modernization needs analysis conducted for NCSDPH. The \$7.5 billion funding level provides for both physical revitalization and an additional amount equal to 34 percent of the hard physical cost estimates, or \$1.9 billion, for costs such as architectural and engineering, relocation, stabilization of the development during redevelopment, planning,

construction phasing (due to renovating portions of a development that may be occupied), and related contingency costs. Therefore, of the \$7.5 billion estimate, \$1.9 billion is a supplement covering costs deemed necessary and appropriate for addressing the needs of severely distressed public housing.

Another significant aspect of the funding recommendation for physical revitalization is that funds are expected to be “fungible” and to be used for replacing housing units that will be demolished or disposed of as part of a proposed treatment program. This part of the recommendation is designed to enable effective implementation of a revitalization program that may otherwise be delayed or deterred as unfeasible because of the lack of funds for replacement housing. Significant portions of these recommendations have been included in the recently enacted Urban Revitalization Demonstration Program for severely distressed public housing.

The NCSDPH also called for funds to implement a demonstration sale and leaseback program using tax credits as well as funding at the level of eight person-years to establish a separate unit within HUD for administering the program for severely distressed public housing. As indicated above, a significant amount of funding and a three-step set of recommendations have been made by NCSDPH to address the issues pertaining to the lack of data on public housing and the problems with implementing the proposed method for defining severely distressed public housing.

As mentioned above, many of NCSDPH's recommendations have been incorporated into the new Urban Revitalization Demonstration Program. This program allows for up to 20 percent of program funding to be used for social support services and related activities. The program also allows for funds to be used for management improvements and security services. PHAs will be given the opportunity to propose changes in the management and operation of these developments, including undertaking economic development activities. The program should provide an excellent opportunity for implementing many of the proposals developed by NCSDPH and for addressing the conditions of severe distress that plague certain public housing developments.

## **Conclusion**

These and other NCSDPH proposals should indicate interest in addressing not only the needs of severely distressed public housing

but also the funding or resources available for other public housing developments. An attempt was made to structure the proposals in a manner supporting, where possible and appropriate, additional resources benefiting all public housing residents. The concerns and interests of residents were a primary focus of NCSDPH and were reflected in its research and reports. The commissioners took steps to examine the entire public housing program while focusing on severely distressed public housing as directed by Congress.

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