



UNITED STATES GENERAL ACCOUNTING OFFICE  
WASHINGTON, D.C. 20548

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COMMUNITY AND ECONOMIC  
DEVELOPMENT DIVISION

MAR 1 8 1980

The Honorable Lawrence B. Simons  
Assistant Secretary for Housing-  
Federal Housing Commissioner

AGCO1065

Comments on

AGC00023

Dear Mr. Simons:

By letter dated August 3, 1979, we wrote to you expressing our concerns and making certain suggestions about the evaluation being planned in connection with the Department of Housing and Urban Development's public housing security demonstration program, a program authorized by the Public Housing Security Demonstration Act of 1978 (12 U.S.C. 1701). Your reply of October 18, 1979, described the actions being taken by the Department on our suggestions except for one issue--the number of project sites to be evaluated.

In view of the actions being taken or planned by the Department we have decided not to continue with our review of public housing security measures and related crime and vandalism problems. The demonstration program, if successful, should provide a basis for the Departmental and legislative actions necessary to establish a comprehensive security program for public housing and to increase coordination between anti-crime programs of State and other Federal agencies.

We have some further observations, and recommendations to make, however, based on our survey efforts to date, which may be helpful to the Department in improving public housing security. Our observations relate to (1) the matter brought to your attention in our letter of August 3, 1979, regarding the number of project sites to be evaluated which your reply did not resolve; (2) the lack of staff assigned to direct the demonstration program; and (3) the need for an effective organization and funding mechanism to assure that the demonstration program results are acted upon by the Department to establish and maintain an effective comprehensive security program for the Nation's public housing projects.

NUMBER OF PROJECT SITES EVALUATED  
UNDER DEMONSTRATION PROGRAM

The Department plans to evaluate program results at only 10 projects although awards will be made to about 39 projects



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under the demonstration program. You stated in your October 18, 1979, letter to us that although the Department had increased the overall evaluation budget to provide in-depth evaluations at the 10 selected project sites, it would be prohibitive to perform such evaluations at all 39 projects. We understand the evaluation budget will be increased from \$0.5 million to between \$1 and \$1.5 million for the approximately \$40 million program.

Impact and process evaluations will be conducted at these 10 projects to measure the feasibility, impact, and effectiveness of the anti-crime strategies tested under the program. The impact evaluation will examine changes in victimization rates, fear, and altered behavior patterns due to crime before and after the anti-crime strategies are implemented. The process evaluation will include onsite observation and interviews to study how the strategies are implemented.

The Department's approach in evaluating 10 projects is intended to provide a basis for reporting program results and devising models for a comprehensive anti-crime program. In effect, the Department will fund but not make any evaluations at 29 projects--nearly 75 percent of the demonstration projects. In our view, this will result in a substantial void in reporting program results for those projects to the Congress and other interested parties.

#### Conclusions and recommendations

Since the overall program objective is to demonstrate and evaluate anti-crime strategies, it is not clear to us how the Department intends to meet that objective if it does not provide for any evaluations at the 29 project sites. The funding of the 29 demonstration projects without evaluating their results does not seem to be consistent with the program objective.

We recommend the Department either evaluate all the projects in order to provide a basis for reporting demonstration program results or not fund the 29 projects for which evaluations will not be conducted. Consideration might also be given to reducing the number of projects to a point where the money saved could be used to evaluate the remaining projects.

#### INSUFFICIENT DEPARTMENT STAFF ASSIGNED TO DEMONSTRATION PROGRAM

The 39 projects participating in the demonstration program will require technical assistance and guidance on security and related matters. They may contract directly with private consultants for such services or they may seek assistance from the Department. The program as designed contemplates some central office staff with specialized expertise to provide technical assistance directly or through consultants monitored by the in-house staff. As the program gets underway, the staff will be responsible for:

- providing technical assistance and guidance to program participants;
- instructing and training field office and local housing authority personnel;
- monitoring program planning and implementation at the 39 project sites;
- coordinating the program with 10 Federal agencies;
- coordinating program evaluation with the Office of Policy Development and Research; and
- resolving problems encountered during modification of work plans, implementation, and enforcement of local housing authority commitments.

The central office staff assigned to the demonstration program includes the program director, a transferred employee, an intern, and a part-time secretary.

#### Conclusions and recommendation

It appears to us that current staff resources are not sufficient to accomplish required tasks effectively. Department officials agreed that the staff resources are inadequate but advised us that final staffing determinations had not yet been made at the completion of our work in November 1979.

We recommend that the Department commit sufficient staff resources to provide necessary technical assistance and guidance and to assure satisfactory program results.

#### NEED FOR EFFECTIVE ORGANIZATION AND FUNDING

Although the security demonstration program could provide a basis for a comprehensive security program, we believe that certain changes are needed in the Department's organization and in the way funds are utilized for security purposes if a national security program is initiated as a result of the demonstration program. The problems in the past appear to be (1) the lack of a focus in the Department to draw attention to the security problem and (2) the inability of the Department to provide funds for security purposes on a priority basis.

## Lack of organizational emphasis on security problems

The Department has no permanent office or staff assigned to provide emphasis and coordination for public housing security. Minimum standards for public housing security have not been established. No mechanism or procedure for assessing public housing crime and vandalism on a continuing basis exists. The only vandalism figures reported to the Department are by a memo entry on some local housing authority operating statement. The data is known to be incomplete and unreliable, and is not used by the Department. One housing official described the Department's past security efforts as "intermittent, inconsistent, and lacking support at the top levels." Another official stated that until the current Urban Initiatives Anti-Crime Program began, no clear Departmental policy was aimed at crime in public housing.

The full benefit of the Department's security research may not be achieved because of ineffective coordination between research and housing program officials brought about by the lack of a focal point for security. For example, the Department's Office of Policy Development and Research (PDR) awarded a contract to develop and assess comprehensive security plans at several housing projects. The results of the plans were to be used to develop a set of security manuals for use by public housing authorities. At least five comprehensive plans were developed for specific public or multi-family housing projects. None of these plans were implemented and tested due to lack of Department or housing authority support. A PDR official partially attributed the failure to implement the plans on difficulty in obtaining agreement with housing officials in central, regional, and area offices. Consequently, the projects did not benefit from planned security improvements and the effectiveness of various security strategies was not determined. Nevertheless, PDR is distributing to all local housing authorities a set of security manuals developed by the contractor based in part on these untested surveys and plans. Since PDR, as a research unit, cannot fund the implementation of security plans, cooperation from housing program officials and local housing authorities is essential to this kind of security research. However, with no organizational unit responsible for security, the necessary coordination is very difficult to achieve.

## Recommendations

We recommend that the Department establish a responsible organizational unit at a sufficiently high level to assure program emphasis and priority if a national security program

is initiated. The unit should be able to effectively coordinate Departmental security efforts and those of other agencies or sources.

We recommend further that the Department establish minimum security standards which could serve as a basis for measuring local housing authority performance in meeting security needs.

#### Changes needed in funding security measures

Local housing authorities have two traditional fund sources available from the Department to provide for security needs. The first source is modernization funds which may be used for major capital improvements as well as improvement of management and social services. Such improvements include, for example, lobby alterations and security equipment to control access in a high-rise building. The second source is the annual operating subsidy which augments rental receipts and may be used for the management, maintenance, and general operation of housing projects. Operating funds may be used for security guards and supportive services at the projects. Funds authorized by the Department for fiscal 1979 included about \$546 million (loan authorization) for modernization and \$727 million for operating subsidies.

If the Department ultimately implements a permanent security program as a result of the demonstration program, it will need to resolve past problems in deciding priorities for utilizing these two funding sources for security.

#### Modernization funds

Modernization funds are granted yearly based on applications submitted by the housing authorities. In approving the requests, the Department gives priority consideration for

- work needed to comply with Federal, State, and local laws regarding health and safety;
- work needed to preserve the basic integrity of structures and systems;
- work which will result in an immediate and demonstrable cost-benefit to the authorities; and
- work which will result in energy conservation.

Security is not given priority consideration in the application process. Such fund expenditures may benefit security if funds are available after the above priorities are met or if the priority work also involves security improvements.

Recognized crime reduction experts and public housing residents and management staff consider modernization-funded programs inadequate solutions to crime and vandalism problems because they do not provide continued funding and a multi-year commitment. Crime reduction experts attending a security conference in October 1978, agreed that the security demonstration program should not be implemented in a manner to suggest it is another one-shot solution to the long standing problems of crime and fear in public housing. The conference participants believed the Department should take efforts to make the security demonstration program part of an ongoing, permanently funded, long-term commitment to provide greater public housing security.

The participants also stressed the importance of an integrated approach utilizing physical, social and managerial changes or anti-crime strategies that are mutually reinforcing. The Department's security demonstration program, if effectively implemented, should provide such an integrated approach.

Public housing residents and management staff expressed similar opinions at a security conference in September 1978. Participants were critical of Department reliance on special programs that provide security funding for only 1 year. Conference participants concluded:

"There was a universal belief that HUD must make security in public housing a priority within the Department. People within HUD must realize that safe, sanitary, and decent housing can only be provided if sufficient attention and money is provided for security issues."

#### Operating subsidies

Annual operating subsidies are provided to local housing authorities based on a budget application process. The subsidy amount is determined through a complex formula calculation designed to provide each housing authority with the subsidy needed for efficient management operations. Needs and priorities are established by the local housing authority within available fund resources in preparing approval by the Department.

In the budgetary process, spending for security purposes must compete with utility, maintenance, and emergency repair needs for available operating funds. We were advised by some local housing authority officials that in many instances, expenditures for identified security deficiencies had to be deferred because funds were limited and had to be used for other more urgent needs such as roof repairs.

Several Department field officials advised us that in their review and approval of budget applications they solicit

explanations from housing authority officials on proposed expenditures. They also approve the proposed budget after determining the amounts are reasonable for each category of expense. They also monitor expenditures during the year, by category, to assure that they do not exceed established limitations. They advised us that they do not direct how much should or should not be spent for specific needs, but they make suggestions and recommendations to assure the proposed plan and amounts are reasonable and within limitations. Thus, needs and priorities are determined largely by the housing authority.

In case of serious disagreement between a housing authority and the Department on proposed expenditures for security or other needs, the Department can withhold the operating subsidy. We were advised that such an action is avoided as impractical because of the ultimate adverse impact on housing tenants due to reduced security, maintenance, utility, and other services if funds are curtailed.

The only other alternative available to the Department if there is a disagreement as to planned expenditures would be to take over the management of the housing authority. Department officials stated that generally such action is impractical and is avoided.

#### Recommendations

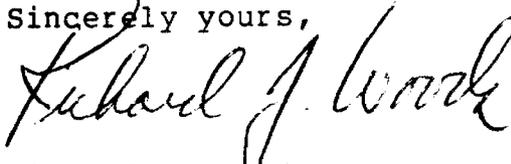
If the Department is to be successful in implementing recommendations resulting from the demonstration program, we believe it will have to overcome the potential problems involved if it attempts to fund security activities through modernization funds or operating subsidies. If the Department plans to use modernization funds to alleviate problems identified during the demonstration program, we recommend that security be made a priority item in order to compete with other needs. We also recommend that as one way to overcome the problems involved in using operating subsidies, the Department fund security measures separate from operating subsidies.

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As indicated earlier, our observations on security management problems and weaknesses may be helpful to the Department in considering actions to improve public housing security. We would be pleased to discuss these matters further with you or your staff. We would appreciate your views on the matters discussed in this letter.

Because some matters discussed herein relate also to responsibilities of the Assistant Secretary for Policy Development and Research, we are providing her with a copy of this letter.

Sincerely yours,

A handwritten signature in cursive script that reads "Richard J. Woods". The signature is written in black ink and is positioned to the right of the typed name.

Richard J. Woods  
Associate Director