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PHOTOCOPY
PRESERVATION



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
WASHINGTON, D.C. 20410-7000

MAR 9 1993

OFFICE OF THE ASSISTANT SECRETARY FOR
COMMUNITY PLANNING AND DEVELOPMENT

Memorandum For: Bruce Reed, Deputy Assistant for Domestic
Policy

From: Bruce ^{PK}Katz, Chief of Staff, SX

Mark Gordon, Deputy Assistant Secretary for Operation/
Chief of Staff for CPD, CO

As per our discussion on Friday regarding the President's anti-crime initiative, enclosed is a draft notice that HUD can send to CDBG recipients to encourage use of funds under the President's stimulus plan for anti-crime activities. Note that HUD will make program staff available to help localities develop plans to use CDBG stimulus funds for this purpose.

In addition, we are considering allowing funds used for public services for anti-crime initiatives to be exempt from the CDBG cap for services that would otherwise apply. This would permit larger cities that are near their 15% cap on public services expenditures to exceed the cap for anti-crime related purposes. Of course, our ability to do this is dependent on the Secretary's receiving general waiver authority under the CDBG stimulus legislation.

**(Proposed content of a Notice on use of CDBG for
crime prevention and alleviation)**

Since President Clinton has made combating crime a priority, HUD has prepared this Notice to remind CDBG grantees of a number of ways that CDBG funds can be used to complement other funds that are aimed at addressing the serious problems of crime in urbanized areas. It is recognized that little is gained from the physical redevelopment of deteriorated urbanized areas if rampant crime makes those areas undesirable places to live and such crime is not adequately dealt with. Therefore, HUD expects that the need for treatment of this problem will be taken into account by CDBG grantees as part of their community development planing.

HUD will make staff available to answer any regulatory questions or otherwise assist grantees that wish to use CDBG funds for the President's stimulus package to address problems of crime.

Some examples of activities that would be eligible for assistance with CDBG funds and that would address problems of crime are:

1. Increasing the level of law enforcement ^{OR NUMBER} ~~activities~~ ^{PRESENCE} in applicable areas, such as, police patrols;
2. Educating members of neighborhoods about the value of crime watch efforts and assisting in the formation of groups to carry out such efforts; ^{THROUGH NEW HIRES OR OVERTIME}
3. Working with members of gangs in an attempt to redirect their activities to those that support rather than harm their communities;
4. Paying for the costs of relocating the residency of police officers to areas of high crime so that their presence during off-duty hours might serve to discourage criminal activities there;
5. Provision of additional recreational activities for youth and young adults residing in areas of high crime;
6. Provision of additional day care and after-school care for children of working parents residing in areas of high crime;
7. Additional drug education, counseling and rehabilitation for affected persons residing in areas of high crime.
8. Redesigning and modifying parks, playgrounds and other public places to enhance public safety and to minimize opportunities for covert illegal activities;

9. Installation of devices that serve to restrict, slow or otherwise limit the free flow of vehicular traffic into and through residential streets, such as speed bumps and bollards;
10. Acquisition, demolition or other methods of dealing with properties that attract or otherwise support the conduct of covert illegal activities;
11. Installation of additional lighting devices in public places to minimize opportunities for the conduct of illegal activities during hours of darkness; and,
12. Installation of security devices on residential properties to assist in the safeguarding of persons residing in areas of high crime, particularly those who are most vulnerable such as the elderly or handicapped.

HUD urges each CDBG grantee to carefully consider the need for supporting such activities where applicable within its jurisdiction as it establishes its local priorities for use of CDBG funds (including program income) to be received in the future or when it is considering reprogramming funds previously received.

This Notice is intended to make clear to State and local officials that CDBG resources may be used for this purpose and that HUD is eager to assist in facilitating such uses. Of course, States and localities continue to be free to set their own priorities for use of CDBG funds.



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
OFFICE OF THE SECRETARY
WASHINGTON, D.C. 20410-0001

FAX TRANSMISSION

DATE: 3/14/93

NUMBER OF PAGES (including this page) _____

TO: Jose Cardo

FROM: Bruce Kase

PHONE: 456 7739

PHONE: 708-2713

(the phone number of this fax machine is (202) 708-2476)

Staff 10-12 noon

64 Ham

hartenberg - staff

- ① Stimulus Funds to fight crime - outline
- ② Summary - \$1.5 billion (over 5 years) Vote sports
for housing communities to fight crime \$690 million
- ③ Eliminates — about \$200 million over baseline
 - ↳ built by formula
 - ↳ more community-based
 - ↳ allows them to know for improved of the
 - ↳ better categorized

PIH 3/8/93

**Community Partnerships Against Crime
(COMPAC)**

Problem Statement

Local officials, housing authorities and HUD share the responsibility of providing safe and decent housing for public housing residents. Housing in many areas suffers from rampant crime which may include gangs or drug dealers imposing a reign of terror on local residents. The increase in crime activity has not only led to fear and acts of violence against residents but also to a deterioration of the physical environment resulting in substantial government expenditures.

Crime is no longer limited to the largest cities of America. The problems of crime and drugs have spread to the smaller cities and suburbs. Federal Bureau of Investigation data show significant increase in violent crimes against persons and crimes against property since 1985 in both large and small urban areas.

Program Response

The "quality of life" for the residents of any community is defined and maintained locally. The most successful programs demonstrate that local people are best positioned to respond and solve crime related security and social issues. It's at this level values and attitudes can be influenced and changed to help eliminate crime from neighborhoods. For public housing, local people include, housing authorities, residents, local officials and service providers.

Acknowledging crime as a moral, socio-economic and legal issue requires all sectors of the community to collaborate in the development of comprehensive plans which address housing management, enforcement and prevention strategies.

The program should focus resources to the greatest assessed need; be flexible enough to respond to the circumstances in each given community; provide a cost effective funding option; and establish standards for enforcement which establish, define and/or clarify the roles of local officials, enforcement personnel, housing authorities and residents.

Funding should be provided to housing authorities to focus on the following activity areas:

- o Enforcement Support should be expanded through the reimbursement of local law enforcement agencies, additional security and protective services. Contracts should be negotiated at the local level among city officials, police departments, housing authorities, security staff and residents for the provision of enforcement and security services. Agreements should

include services to be provided by each entity; and the authority they have or do not have in execution of their specified responsibilities. Services must be above and beyond services to be provided by the Cooperative Agreement. All enforcement/security personnel should meet minimum training, licensing and certification standards.

- o Community Policing has been an effective tactic in gaining control in crime ridden neighborhoods. The provision of police officers to specific neighborhoods on a consistent basis builds relationships with residents thereby increasing information exchange which deters and prevents crime. Residents become less fearful of reporting crime and therefore participate in solutions to confront crime problems. Foot or bicycle patrols, police substations in public housing, community relations officers and other techniques which put the officer in more direct contact with the community have demonstrated results in reducing crime statistics.
- o Crime Prevention efforts are essential which include residents as the focal point of services and as participants in crime solutions. Activities may include resident patrols, neighborhood watches or other crime prevention efforts. Resident participation is necessary in sustaining security in public housing developments. Efforts should be made for the training and employment of residents in appropriate enforcement and prevention activities. Greater volunteer partnerships should be encouraged with Volunteer Action Centers, VISTA and the Peace Corps.
- o Youth Initiatives should recognize public housing youth as an essential resource in solving community problems. Their enlistment can in itself be good prevention programming. Youth can be coaches in recreational programs, peer mentors, and leaders in community solution action planning. More emphasis should be placed on training, education, recreation, career planning, employment, substance abuse education and prevention. Youth programming should provide the opportunities, skills and information needed for youth to make appropriate life style choices and offer a deterrence to gang activity.
- o Resident Services Programs provide comprehensive resident services to effectively intervene and prevent crime activities in public housing populations. Services may include job training, educational programs, treatment or other appropriate social

services which address the contributing factors of crime. Services should include substantial resident participation in jobs created by the Department's \$5 billion capital improvement program.

- o Management Activities will be allowable, up to 25% of the requested grant, for improved lease enforcement (including expanded legal staff to take cases to court), upgraded management presence on-site (especially nights and weekends), additional maintenance presence, and vacancy reduction efforts.
- o Physical Security Hardware costs such as surveillance systems would be allowable up to 15% of the grant.

The role of HUD is to provide support which fosters creativity and reinforces success. Support services should include program funding, technical assistance, training, information dissemination and evaluation. Appropriate responsibilities would include:

- o Development of a standardized assessment tool to be used in the initial application to demonstrate need and to serve as a baseline to track and evaluate outcome measures.
- o Drafting of model contracts between housing authorities, police departments, security contractors, and residents for the provisions of enforcement services.
- o Ensuring local entities discharge the obligations of the Cooperative Agreement by providing comparable services to the residents of public housing.
- o Development and delivery of technical assistance, training and information services to share and promote effective programs.
- o Training and coordination of HUD's Regional and Field Office staff to facilitate program policy consistency.
- o Issuing evaluation contracts for an objective review of program effectiveness which incorporates the tracking of baseline data.

Funding Structure

Housing authorities should submit plans for comprehensive crime suppression, intervention and prevention strategies. Since it takes time to hire and adequately train additional security staff, develop new programs and implement them to the degree that

they can be evaluated for effectiveness, plans should cover a five year strategy cycle. Like the modernization program, there should be two funding "pots":

- o Seventy five percent would be allocated based on a needs assessment formula to housing authorities with the most severe crime problems; and,
- o Twenty five percent would be distributed to other housing authorities on a competitive basis.

Funds would initially be awarded based upon four selection criterion, which include: the demonstrated need; the quality of the security plan; the capability of the applicant to carry out the plan; and resident participation in defining objectives, specifying services, implementing programs and tracking performance.

A standardized assessment tool would be developed as a baseline measure to determine need. The assessment would include such factors as:

- o Crime figures such as calls for service, arrest records, officer complaints and other appropriate data.
- o Collection of management indicators which may be used to track security impact (vacancy rates, vandalism costs, insurance application data, etc.).
- o On-site reviews to observe crime activities and to document what types of variables are contributing to crime; how and when are crimes committed; who is committing the offenses; and the impact of crime activity on resident safety.
- o Surveys to document the residents and surrounding community members perception of the crime problem.

After initial awards have been made, funding will continue for four consecutive years contingent upon an annual performance review. Each participating housing authority will submit a Performance Report documenting lease enforcement, vacancy reduction, maintenance efforts, program performance and a comparison of baseline data from the assessment tool. Based on their own program analysis, housing authorities may also choose to submit appropriate program changes for the upcoming year.

Resource Justification

It is impossible to quantify the amount of funding necessary to respond to the crime and related social issues within public housing communities. The need and appropriate response varies

from community to community. One community may need a extensive law enforcement effort, while another's needs may focus on creating youth programs to deter gang activity.

Within Public and Indian Housing funded programs, there are several resources which address security and social programs to promote safe and decent housing. Analysis of these various funding sources was reviewed to estimate funding levels for this program. The recommended funding level of COMPAC for FY 1994 would be \$220 million in grants to housing authorities. An additional \$5 million would be made available to HUD for the development of an assessment tool; provide technical assistance, training and information dissemination; cover the expenses of a peer review process and to conduct national program evaluation. For FY 1995 and FY 1996 the funding request will be increased to \$265 million annually. The program would abolish the existing Public and Indian Housing Drug Elimination Program and the Youth Sports Program.

The Public and Indian Drug Elimination Program (PHDEP) during FY 1992 awarded \$140.5 million in grants to 427 successful applicants. Funding supports activities from increased law enforcement and security efforts to the development of treatment and youth prevention programs. An additional 60 applicants requesting \$14.5 million received passing scores but were not granted awards because funding ran out. Because of the competitive nature of the grant procedures, there were also applicants who had received funding in prior years but were not funded in continuation efforts.

Competition for the Youth Sports Program (YSP) was even greater. A total of 487 applications were received for a combined funding round of FY 1991 and FY 1992 which totalled \$15.75 million. Of these only 148, or one in three were funded, leaving an additional 187 applicants requesting \$19 million with passing scores which were not funded. Funding can be used for the development and implementation of all kinds of youth program activities, including the construction of facilities.

Comprehensive Modernization grants improve the physical condition of existing public housing stock and upgrade the management and operation of the developments. During FY 1991, an estimated \$45 million funded physical security efforts. Data was not collected on related social programs.

Of the FY 1991 Operating Subsidy funds provided to housing authorities, there was approximately \$105 million allocated for security purposes. Once again, information on related social programs was not collected. Operating subsidies are paid to housing authorities to cover their operating deficits (reasonable operating expenses and utility costs less rents chargeable to tenants). In considering funding of a new program, resources

should not replace operating budget funding but should in fact supplement this resource. In cases where activities, such as a Housing Authority Police Force, were included in the 1973 "base year" new funds should not be allowed to cover these expenses. In other cases where security related expenses have in fact replaced what had previously been maintenance or other expenses they may be eligible expenses under a new funding source.

Combining eligible applicants from the above four listed programs, generates a annual demand for \$340 million in security related expenses. This includes all security related funds within Operating Subsidy.

The Council of Large Public Housing Authorities, the National Association of Housing and Redevelopment Officials, and the Public Housing Agencies Directors Association jointly published the report Security, Crime and Drugs in Public Housing: A Review of Programs and Expenditures in August 1992. This report estimates security related costs at \$276 million annually.



U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
OFFICE OF THE SECRETARY
WASHINGTON, D.C. 20410-0001

FAX TRANSMISSION

DATE: 3/15
3/12

NUMBER OF PAGES (including this page) 3

TO: Jose Cerda

FROM: Bruce Katz

PHONE: 456-2564

PHONE: _____

(the phone number of this fax machine is (202) 708-2476)

- Jose, this is a first draft!

DRAFT

Community Partnerships Against Crime (COMPAC)

Problem Statement

Local officials, housing authorities and HUD share the responsibility of providing safe and decent housing for public housing residents. Housing in many areas suffers from rampant crime which may include gangs or drug dealers imposing a reign of terror on local residents. The increase in crime activity has not only led to fear and acts of violence against residents but also to a deterioration of the physical environment resulting in substantial government expenditures.

Program Response

The "quality of life" for the residents of any community is defined and maintained locally. The most successful programs demonstrate that local people are best positioned to respond and solve crime related security and social issues. For public housing, local people include, housing authorities, residents, local officials and service providers.

The program shall focus resources to the greatest assessed need; be flexible enough to respond to the circumstances in each given community; provide a cost effective funding option; and establish standards for implementation which establish, define and/or clarify the roles of local officials, enforcement personnel, service providers, housing authorities and residents.

Funding will be provided to housing authorities to focus on the following activity areas:

- o Enforcement Support to expand through the reimbursement of local law enforcement agencies, additional security and protective services. Services must be above and beyond services to be provided by the Cooperative Agreement.
- o Community Policing has been an effective tactic in gaining control in crime ridden neighborhoods. Foot or bicycle patrols, police substations in public housing, community relations officers and other techniques which put the officer in more direct contact with the community have demonstrated results in reducing crime statistics.
- o Crime Prevention efforts are essential which include residents as the focal point of services and as participants in crime solutions. Efforts should be made for the training and employment of residents in appropriate enforcement and prevention activities.

- o Youth Initiatives recognize public housing youth as an essential community resource with more emphasis placed on training, education, recreation, career planning, employment, substance abuse education and prevention.
- o Resident Services Programs provide comprehensive resident services to effectively intervene and prevent crime activities in public housing populations. Services may include job training, educational programs, treatment or other appropriate social services which address the contributing factors of crime.
- o Management Activities up to 25% of the requested grant.
- o Physical Security Hardware would be allowable up to 15% of the grant.

Funding

The recommended funding level of COMPAC for FY 1994 will be \$240 million in grants to housing authorities. An additional \$25 million would be made available to HUD for the development of an assessment tool; provide technical assistance, training and information dissemination; cover the expenses of a peer review process and to conduct national program evaluation.

Housing authorities will submit plans for comprehensive crime intervention and prevention strategies. Plans shall cover a five year strategy cycle. A standardized assessment tool will be used in the initial application to demonstrate need and to serve as a baseline to track and evaluate outcome measures. Funding of housing authorities will be based on a formula.

- o (Seventy five percent would be) allocated based on a needs assessment formula to housing authorities with the most severe crime problems; and,
- o (Twenty five percent would be) distributed to other housing authorities on a competitive basis.

Funds would initially be awarded based upon four selection criterion, which include: (1) the demonstrated need; (2) the quality of the plan; (3) the capability of the applicant to carry out the plan; and (4) involvement of local government, service providers and residents in defining objectives, specifying services, implementing programs and tracking performance.

Each participating housing authority will submit a Performance Report yearly documenting lease enforcement, vacancy reduction, maintenance efforts, program performance and a comparison of baseline data from the assessment tool.

June 11, 1993

**THE HOUSING AND COMMUNITY DEVELOPMENT ACT OF 1993
INITIATIVES FOR PRESIDENTIAL ATTENTION**

HUD is developing an authorization bill for this year -- the Housing and Community Development Act of 1993. The following legislative proposals warrant Presidential attention and could be announced through White House or other events involving the President.

Revitalizing FHA

HUD's legislation would restore FHA's ability to serve homebuyers, particularly first-time homebuyers, who are locked out of the conventional market. The legislation would:

raise mortgage limits in high-cost areas to \$170,000 (85 percent of the secondary market limits);

create a new no-downpayment program for low- and moderate-income homebuyers in community revitalization areas;

streamline and simplify the mortgage application process; and

authorize demonstrations that increase homeownership opportunities through partnerships with Fannie Mae, Freddie Mac, the Federal Home Loan Banks and individual state and local housing agencies.

Removing Barriers to Work

HUD's legislation would remove the disincentives to work that are contained in public housing rent rules. The current "30 percent" rule, for example, penalizes tenants who try to move from welfare dependency to self-sufficiency.

HUD's legislation would exclude for 18 months the earned income of public housing residents who obtain employment.

Resolving FHA's Multifamily Crisis

HUD's legislation would give the Department the tools and authority to remedy significant material weaknesses that have been inherited by this Administration. HUD, for example, now owns hundreds of distressed multifamily projects, making it perhaps the biggest slumlord in the nation. HUD's legislation would enable the Department to dispose of these properties in a way that stabilizes neighborhoods, preserves affordability and minimizes cost to the federal government.

Community Partnerships Against Crime

HUD's legislation would create the Community Partnerships Against Crime program -- COMPAC. The program, part of the President's Investment package, would be authorized at \$265 million for FY 1994 and \$325 million for FY 1995.

Funds would be allocated directly to public housing agencies -- which would be required to work with community-based organizations, resident councils and other city agencies on comprehensive anti-crime strategies.

Eligible activities would include not only funding for cops and security hardware but also crime prevention -- youth sports programs, mentoring and anti-gang activities and other supportive services.

Helping Residents Help Themselves

A series of HUD actions would significantly expand support for a range of resident initiatives in public and assisted housing.

On the legislative front, HUD is seeking to create a "Tenant Opportunity Program", authorized at \$25 million. This program could fund not only training for resident management (the traditional focus of HUD's programs) but also capacity building and planning for resident organizations, job training, development of resident businesses, youth corps and other economic self-sufficiency initiatives.

On the regulatory front, HUD is seeking to bring order and uniformity to the formation of resident councils and organizations. There are currently no uniform guidelines or charters which govern such formation, leading to substantial confusion throughout the nation.

Economic Development Initiative

HUD's legislation would enable state and local communities to use up to \$2 billion in loan guarantees for economic development activities ("section 108 loan guarantees") that was authorized in last year's housing bill. HUD's legislation would, for example, use funds recaptured under the old UDAG program to lower the interest rate for business loans. Various statutory impediments to the use of these guarantees would also be removed. These legislative changes could have a substantial stimulative impact on distressed urban communities.

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*(Formerly Title III)***SUBTITLE C -- COMMUNITY PARTNERSHIPS AGAINST CRIME**

SEC. 280a. (a). Section 3001 of the Anti-Drug Abuse Act of 1988 is amended --

(1) by striking out "CHAPTER 2 -- PUBLIC AND ASSISTED HOUSING DRUG ELIMINATION" and inserting in lieu thereof the following: "CHAPTER 2 -- COMMUNITY PARTNERSHIPS AGAINST CRIME";

(2) by striking out "Congressional findings." and inserting in lieu thereof the following: "Purposes."; and

(3) by adding after "Sec. 5130. Authorization of appropriations." the following: "Sec. 5131. Technical assistance.".

(b) The heading for chapter 2 of title V of the Anti-Drug Abuse Act of 1988 is amended to read as follows: "CHAPTER 2 -- COMMUNITY PARTNERSHIPS AGAINST CRIME".

SEC. 281. Sections 5121, 5122, and 5123 of the Public and Assisted Housing Drug Elimination Act of 1990 are amended to read as follows:

"SEC. 5121. SHORT TITLE.

"This chapter may be cited as the 'Community Partnerships Against Crime Act of 1993'.

"SEC. 5122. PURPOSES.

"The purposes of this chapter are to --

"(1) substantially expand and enhance the Federal government's commitment to eliminating crime in public housing;

subtitle C of

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"(2) broaden the scope of the Public and Assisted Housing Drug Elimination Act of 1990 to apply to all types of crime, and not simply crime that is drug-related;

"(3) target opportunities for long-term commitments of funding primarily to public housing agencies with serious crime problems;

"(4) encourage the involvement of a broad range of community-based groups, and residents of neighboring housing that is owned or assisted by the Secretary, in the development and implementation of anti-crime plans;

⑥ "(5) provide training, information services, and other technical assistance to program participants; and

⑦ "(6) establish a standardized assessment system to evaluate need among public housing agencies, and to measure progress in reaching crime reduction goals.

"SEC. 5123. AUTHORITY TO MAKE GRANTS.

"The Secretary of Housing and Urban Development, in accordance with the provisions of this chapter, may make grants (1) to public housing agencies (including Indian housing authorities) and (2) using amounts appropriated for fiscal year 1994 only, to private, for-profit and nonprofit owners of federally assisted low-income housing, for use in eliminating crime in and around public and other federally assisted low-income housing projects."

in consultation with
the Attorney
General and

(5) reduce crime and disorder in and around public housing through the expansion of community-oriented policing and problem solving;

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1 SEC. 202. Section 5124 of such Act is amended --
2 (1) by striking out "(a) PUBLIC AND ASSISTED
3 HOUSING. --";
4 (2) by inserting immediately after "used in" in the
5 introductory material the following: "or around";
6 (3) in paragraph (3), by inserting immediately before
7 the semicolon the following: ", such as fencing, lighting,
8 locking, and surveillance systems";
9 (4) by striking paragraph (4)(A) and inserting in lieu
10 thereof the following:
11 "(A) to investigate crime; and";
12 (5) in paragraph (6) --
13 (A) by striking out "in and around public or
14 other federally assisted low-income housing projects";
15 and
16 (B) by striking out "and" after the semicolon;
17 (6) in paragraph (7) --
18 (A) by striking out "where a public housing
19 agency receives a grant,";
20 (B) by striking out "drug abuse" and inserting in
21 lieu thereof "crime"; and
22 (C) by striking out the period at the end and
23 inserting in lieu thereof a colon;
24 (7) by adding the following new paragraphs after
25 paragraph (7):
26 "(8) community policing programs;

7

the employment or utilization of one or more individuals, including law enforcement officers, made available by contract or other cooperative arrangement with State or local law enforcement agencies, to engage in community and problem-oriented policing involving interaction with members of the community on proactive crime control and prevention;

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(9) youth initiatives, such as activities involving training, education, after school programs, cultural programs, recreation and sports, career planning, and entrepreneurship and employment; and

(10) resident services programs, such as job training, education programs, and other appropriate social services which address the contributing factors of crime; and

(8) by striking out subsection (b).

SAC. 283. Section 5125 of such Act is amended --

(1) in subsection (a) --

(A) by adding the paragraph designation "(1)" immediately after "IN GENERAL.--";

(B) in the first sentence, by striking out ", a public housing resident management corporation,";

(C) in the second sentence, by striking out "drug-related crime on the premises of" and inserting in lieu thereof the following: "crime in and around"; and

(D) by adding the following new paragraphs at the end:

"(2) The Secretary shall, by regulation issued after notice and opportunity for public comment, set forth criteria for establishing a class of public housing agencies that have especially severe crime problems. Any public housing agency within this class

8

Notwithstanding section 5123, the authority and responsibilities of the Secretary in relation to grants for the purpose described in paragraph (8) shall be exercised and carried out by the Attorney General in consultation with the Secretary. The Attorney General may utilize the Bureau of Justice Assistance, the United States Attorneys, and any other component or official of the Department of Justice in carrying out the function described in the preceding sentence and the consultation required under section 5123.

Overview

- Assist in this integration
- Major initiative coord. w/ HZCC
- the into cities w/ successful w&S program
- Empowerment zones

EXECUTIVE OFFICE OF THE PRESIDENT
OFFICE OF MANAGEMENT AND BUDGET

ROUTE SLIP

TO: Greg Jones, DOJ

Jose Carda, DPC

Paul Weinstein, DPC

Steve Redburn, HTF

Chris Heiser, HTF

Cora Beebe, TCJ

Chris Brown, TCJ

Take necessary action ☐Approval signature ☐Comment ☒Prepare reply ☐Discuss with me ☐For your information ☐See remarks below ☒FROM: Chris Mustain
(202) 395-3923 fax 395-6148

DATE: Wed Jul 14, 1993 1:37pm

REMARKS

Attached is HUD's response to DOJ's comments on the COMPAC proposal.

Please review and provide me with your comments.

cc: Paul Carey
Bob Damus
Bernie Martin
Janet Forsgren
Connie Bowers
Jim Jukes
Doug Steiger

JUL 14 '93 09:10

133 P01

July 14, 1993

Note to: Janet Forsgren
Attn. Chris Mustain

From:  Jeff Lischer

Subject: HUD Response to DOJ Comments on COMPAC Proposal

The attached paper sets forth HUD's response to DOJ's comments on our COMPAC proposal.

cc: Katz, Janis, Pagan, Murphy, Polsby, Lischer, file

-Appcal5.OMB

JUL 14 '93 09:10

155 P02

**HUD
Response to the Department of Justice
Comments on COMPAC**

The Department of Housing and Urban Development (HUD) is strongly opposed to the DOJ recommendation that the Attorney General exercise HUD's authority and responsibilities for making grants for the employment or use of persons, including law enforcement officers, to engage in community and problem-oriented policing involving interaction with members of the community on proactive crime control and prevention. (See proposed amendment to paragraph (10) on page 8 of the draft COMPAC bill language.)

First, COMPAC grants are issued as comprehensive programs which incorporate all eligible activities, including policing activity, into a common strategy. This allows physical design, enforcement tactics, youth programs, resident crime prevention and other appropriate actions to be integrated and implemented under one grant award. This unique funding option has been applauded by constituents and Federal agencies alike. Separating out enforcement activities to be funded independently by the Department of Justice (DOJ) is inconsistent with the principle behind this program.

Second, one of the reasons the Public and Indian Housing Drug Elimination Program (PHDEP) grant was developed was to respond to inadequate policing services being provided to public housing by Federal, State and local enforcement agencies. The program has been successful in leveraging increased services through contracts negotiated by the housing authorities.

Third, DOJ's proposed separation and preemption of one element of the proposed program is wholly out of harmony with HUD's rich history of partnerships with DOJ. Many joint programs have been implemented within the PHDEP, which is being amended to authorize COMPAC. Some examples of demonstrated collaboration include:

- o Headquarters, Regional and Field Office staff were assigned to "Weed and Seed" projects to facilitate the targeting of HUD resources to selected sites. Headquarters staff also serves on numerous steering committees and work groups to develop and implement this initiative.
- o Regional training on "Community Policing in Public Housing" is being jointly developed and delivered. HUD provided \$1.75 million to fund this program.
- o Interagency agreements among HUD, DOJ, Department of Labor, and Department of Education have been signed to target service delivery to "Weed and Seed" sites. Included in the programs to be delivered is "Safe Havens," "Step-up," and "Community Mobilization (Herman

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135 P03

Write Process)." HUD has contributed \$700,000 to this project.

- o HUD has incorporated preference points in application review procedures for programs consistent with "Weed and Seed" and other DOJ programs.
- o HUD is currently working with DOJ to become a partner in the National Criminal Justice Records Service clearinghouse contract to be issued in March 1994.

It is certainly not the intention of HUD to detract from the valuable partnerships experienced with DOJ. In fact, HUD looks forward to continued partnerships in implementing the Administration's programs and sees this program as another opportunity to further existing relationships. HUD will work with DOJ to assure policy directives of policing initiatives are consistent. These combined efforts have not required legislative directive in the past, and we do not think the DOJ suggestion in this case is either appropriate or necessary.

The Department also is unable to accept the suggested change on page 6, line 17, providing for HUD to make COMPAC grants in consultation with the Attorney General. As noted above, HUD has a long history of working closely with DOJ in this area and anticipates working closely with DOJ at all stages of implementation of the COMPAC program. However, we do not think it is feasible to consult with DOJ with respect to each and every grant approval because of the delay and uncertainty such a process would cause. Accordingly, instead of the suggested insert on line 17, we recommend instead that the following new sentence be inserted on page 6, line 24, after the first period:

"In designing the program, the Secretary shall consult with the Attorney General."

=====

Technicals

HUD accepts the following editorial suggestions:

Page 5, line 14, insert after "chapter 3 of" the following:
"subtitle C of".

Page 6, insert after line 10 the following:

"(5) reduce crime and disorder in and around public housing through the expansion of community-oriented policing activities and problem solving;"

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135 134

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Page 7, line 25, replace "(8) community policing programs" with the following:

"(8) the employment or utilization of one or more individuals, including law enforcement officers, made available by contract or other cooperative arrangement with state or local law enforcement agencies, to engage in community and problem-oriented policing involving interaction with members of the community on proactive crime control and prevention;"

\DOJ.Com

1 **TITLE III -- COMMUNITY PARTNERSHIPS AGAINST CRIME**

2 SEC. 301. The United States Housing Act of 1937 is amended
3 by adding the following new title at the end thereof:

4 **"TITLE IV -- COMMUNITY PARTNERSHIPS AGAINST CRIME**

5 **"SEC. 401. PROGRAM AUTHORITY. -- (a) USE OF PROGRAM FUNDS.**

6 -- (1) **GRANTS.** -- The Secretary is authorized to make grants to
7 public housing agencies and Indian housing authorities in
8 accordance with the provisions of this title for use in carrying
9 out eligible activities to implement plans for crime suppression,
10 intervention, and prevention in and around public housing
11 projects.

12 **"(2) TECHNICAL ASSISTANCE AND INFORMATION.** -- The
13 Secretary is authorized to provide technical assistance and
14 to develop statistical and other information in accordance
15 with section 407.

16 **"(b) AUTHORIZATION OF APPROPRIATIONS.** -- There is
17 authorized to be appropriated to carry out this title
18 \$265,000,000 for fiscal year 1994 and \$325,000,000 for fiscal
19 year 1995, to remain available until expended. Of the amounts
20 appropriated for each such year --

21 **"(1)** \$10,000,000 shall be for technical assistance and
22 information under section 407; and

23 **"(2)** of the remainder --

24 **"(A)** 75 percent shall be allocated for formula-
25 based grants under section 402; and

26 **"(B)** 25 percent shall be allocated for
27 competitive grants under section 403;

1 "(c) REUSE OF AMOUNTS. -- Notwithstanding subsection
2 (b)(2), any amount allocated for a formula-based grant that is or
3 becomes available for obligation may be added to the amount
4 allocated for either formula-based or competitive grants.

5 "SEC. 402. FORMULA-BASED GRANTS. -- (a) ELIGIBILITY FOR
6 GRANTS. -- Each public housing agency that owns 1,250 or more
7 public housing dwelling units, and each Indian housing authority
8 that owns 1,000 or more Indian housing dwelling units, shall be
9 eligible to receive an annual grant under this section. The
10 amount of the grant may not exceed the formula amount determined
11 under subsection (b).

12 "(b) ESTABLISHMENT OF FORMULA. -- The Secretary shall
13 determine a grant amount for each eligible public housing agency
14 using a formula established by the Secretary. The formula shall
15 take into account --

16 "(1) statistical data on major crimes in the
17 community;

18 "(2) statistical data on the physical and demographic
19 needs of the agency's projects; and

20 → Do I REC?
21 "(3) other factors that the Secretary finds
22 appropriate.

23 "(c) ADJUSTMENTS TO FORMULA GRANTS. -- Notwithstanding
24 subsection (b), the Secretary may impose special conditions on a
25 grant determined under subsection (a), or may reduce, suspend, or
26 withdraw the grant, if the Secretary determines that such action
27 is appropriate based on the application submitted under section
28 404, the review criteria under section 405, or the performance

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1 review under subsection (e).

2 "(d) PROGRAM PERIOD. -- Annual grants under this section
3 shall be for carrying out activities for each year of a grantee's
4 approved five-year comprehensive crime suppression, intervention,
5 and prevention plan under section 404.

6 "(e) ANNUAL PERFORMANCE REVIEW. -- (1) PERFORMANCE REPORT.
7 -- Each grantee shall submit annually to the Secretary a
8 performance report in such form and according to such procedures
9 as the Secretary may require. The report shall document the
10 grantee's efforts and accomplishments in lease enforcement;
11 vacancy reduction; physical maintenance efforts; the
12 implementation of the grantee's comprehensive crime suppression,
13 intervention, and prevention plan, including results stemming
14 from activities assisted under this title; reductions in crime in
15 and around the public housing projects; and such other matters as
16 the Secretary may specify. The grantee shall also submit such
17 other reports as the Secretary finds necessary to carry out the
18 Secretary's responsibilities under this title.

19 "(2) ACTION BY SECRETARY. -- The Secretary may take
20 action under subsection (c), or any other appropriate
21 action, if the Secretary determines that a grantee is not
22 making satisfactory progress in carrying out its approved
23 comprehensive crime prevention, intervention, and
24 suppression plan, or has failed to comply substantially with
25 the requirements of this title or any other applicable law.

26 "SEC. 403. COMPETITIVE GRANTS. -- (a) ELIGIBILITY FOR

1 GRANTS. -- Each public housing agency that owns fewer than 1,250
2 public housing dwelling units, and each Indian housing authority
3 that owns fewer than 1,000 Indian housing dwelling units, may
4 apply annually for a competitive grant under this section.

5 "(b) SELECTION CRITERIA. -- The Secretary shall select
6 eligible public housing agencies for competitive grants on the
7 basis of the review criteria set forth in section 405, and such
8 other factors as the Secretary deems appropriate.

9 "(c) GRANT TERM. -- Competitive grants shall be for a term
10 of two years. Agencies that are receiving grants may apply for
11 additional grants to continue or expand program actions at
12 locations where assistance under this section has been
13 undertaken, to expand program actions to new locations, or to
14 carry out new activities.

15 "(d) PERFORMANCE REVIEW. -- (1) PERFORMANCE REPORT. --
16 Each grantee shall submit to the Secretary a performance report
17 in such form and according to such procedures as the Secretary
18 may require, as well as such other reports as the Secretary finds
19 necessary to carry out the Secretary's responsibilities under
20 this title.

21 "(2) ACTION BY SECRETARY. -- The Secretary may reduce,
22 suspend, or withdraw the grant, or take any other
23 appropriate action, if the Secretary determines that a
24 grantee is not making satisfactory progress in carrying out
25 its approved comprehensive crime suppression, intervention,
26 and suppression plan, or has failed to comply substantially

1 with the requirements of this title or any other applicable
2 law.

3 "SEC. 404. APPLICATION REQUIREMENTS. -- (a) IN GENERAL.

4 -- Each public housing agency seeking a formula-based grant under
5 section 402 or a competitive grant under section 403 shall submit
6 an application to the Secretary in such form and in accordance
7 with such procedures as the Secretary may establish.

8 "(b) MINIMUM REQUIREMENTS. -- The Secretary shall require
9 an application to contain --

10 "(1) a request for a grant under this title and the
11 amount of the grant requested;

12 "(2) a comprehensive crime suppression, intervention,
13 and prevention plan that --

14 "(A) contains a comprehensive description of the
15 crime activity in and around any public housing project
16 that is owned by the agency and that is covered by the
17 application;

18 "(B) sets forth a strategy to address the crime
19 activity through --

20 "(i) enhanced crime suppression,
21 intervention, and prevention; and

22 "(ii) the provision of housing management
23 and social services;

24 "(C) covers five years, if a formula-based grant
25 is requested, or two years, if a competitive grant is
26 requested; and

1 "(D) contains such additional information as the
2 Secretary may require;

3 "(3) an identification of the activities proposed to
4 be carried out to implement the comprehensive crime
5 suppression, intervention and prevention plan, and the
6 schedule for initiating and completing them;

7 "(4) a description of how the proposed activities will
8 address the crime activity in and around the public housing
9 project;

10 "(5) evidence that in developing the comprehensive
11 crime suppression, intervention, and prevention plan, the
12 public housing agency has --

13 "(A) obtained the cooperation of --

14 "(i) government officials concerned with
15 public safety and social services;

16 "(ii) private social service and nonprofit
17 agencies, as appropriate;

18 "(iii) private service, equipment, or
19 construction suppliers, as appropriate; and

20 "(iv) project residents (including any
21 resident management corporation and resident
22 council); and

23 "(B) involved project residents, resident
24 management corporations, and resident councils, and
25 community-based organizations, as appropriate, in --

26 "(i) defining objectives,

1 "(ii) specifying services,

2 "(iii) implementing programs, and

3 "(iv) monitoring performance;

4 "(6) in the case of any public housing project that is
5 covered by the application and is located in an area
6 identified by the public housing agency in which 20 percent
7 or more of the dwelling units are in projects that are owned
8 or assisted by the Secretary, or have mortgages insured by,
9 or assigned to, the Secretary, evidence that in developing
10 the comprehensive crime suppression, intervention, and
11 prevention plan, the agency has included, and will include,
12 local community-based, non-profit organizations and local
13 resident organizations representing the residents of such
14 projects in the development and implementation of the plan;

15 "(7) a certification that the public housing agency
16 will comply with the requirements of the Fair Housing Act,
17 title VI of the Civil Rights Act of 1964, section 504 of the
18 Rehabilitation Act of 1973, and the Age Discrimination Act
19 of 1975, and will affirmatively further fair housing
20 compliance; and

21 "(8) such additional information as the Secretary may
22 require.

23 "SEC. 405. REVIEW CRITERIA. -- The Secretary shall use the
24 following criteria for purposes of adjusting formula-based grants
25 under section 402(d) and selecting competitive grantees under
26 section 403:

1 "(1) the extent of the crime problem in the public
2 housing project or projects proposed for assistance;

3 "(2) the quality of the comprehensive crime
4 suppression, intervention, and prevention plan and its
5 ability to address the crime problem in the public housing
6 project or projects proposed for assistance, including in
7 the case of competitive grants, the extent to which the plan
8 includes initiatives that can be sustained beyond the term
9 of the grant;

10 "(3) the capability of the public housing agency to
11 carry out the comprehensive crime suppression, intervention,
12 and prevention plan; and

13 "(4) the extent to which the residents, the local
14 government, and the community support and participate in the
15 design and implementation of the activities proposed to be
16 funded under the application.

17 "SEC. 406. ELIGIBLE ACTIVITIES. -- (a) ACTIVITIES. --
18 Public housing agencies may use funds under this title for the
19 following purposes:

20 "(1) support for additional law enforcement, security,
21 and protective services, under contracts or other formal
22 arrangements;

23 "(2) initiation or expansion of community policing
24 activities;

1 "(3) crime prevention activities involving project
2 residents, such as resident patrols, neighborhood watches,
3 and training and employment of residents in such activities;

4 "(4) youth initiatives, such as activities involving
5 training, education, recreation, career planning,
6 employment, and substance abuse education and prevention;

7 "(5) resident services programs, such as job training,
8 educational programs, treatment, and other appropriate
9 social services which address the contributing factors of
10 crime;

11 "(6) funding to nonprofit public housing resident
12 management corporations and resident councils to develop
13 security and drug abuse prevention programs;

14 "(7) housing management activities, such as improved
15 lease enforcement and litigation capacity, additional
16 management and maintenance, and vacancy reduction efforts,
17 except that no more than 25 percent of a grant amount may be
18 used for costs under this paragraph; and

19 "(8) physical security measures, such as surveillance
20 systems, except that no more than 15 percent of a grant
21 amount may be used for costs under this paragraph.

22 "(b) **MAINTENANCE OF EFFORT.** -- Funding under this title may
23 be used for activities set forth in subsection (a) only if the
24 activities have not been provided by the public housing agency or
25 a unit of government during any part of the 12-month period
26 immediately preceding the date of submission of the grant

1 application under this title, unless the Secretary finds that the
2 discontinuation of such activities was the result of events not
3 within the control of the public housing agency.

4 "SEC. 407. TECHNICAL ASSISTANCE AND INFORMATION. -- (a)
5 TECHNICAL ASSISTANCE. -- The Secretary is authorized to provide
6 training, information services, and other technical assistance to
7 public housing agencies and other entities with respect to their
8 participation in the program authorized by this title.

9 "(b) INFORMATION. -- As part of the technical assistance
10 and grantee evaluation functions under this title, the Secretary
11 shall develop statistical and other criteria, information, and
12 guides for --

13 "(1) determining need --

14 "(A) as a review criterion under section 405,

15 "(B) for identifying the public housing agencies
16 that have the most severe crime problems, and

17 "(C) for making formula-based grants under
18 section 402;

19 "(2) assessing and evaluating comprehensive crime
20 suppression, intervention, and prevention plans and
21 activities assisted under this title;

22 "(3) establishing baselines and criteria to inform
23 Federal and grantee program administration; and

24 "(4) establishing systems for the management of
25 criteria, information, and guides.

26 "(c) OPERATIONS. -- (1) PROCEDURES AND FUND TRANSFERS. --

1 The Secretary may carry out duties under subsections (a) and (b)
2 directly, or by contract, grant, or cooperative agreement. If
3 such duties are carried out directly, amounts appropriated for
4 carrying out this title that are attributable to compensation and
5 other costs incurred for them shall be transferred to, and
6 disbursed from, the Salaries and Expenses account of the
7 Department of Housing and Urban Development.

8 "(2) PEER REVIEW. -- In carrying out the Secretary's
9 responsibilities under this title, the Secretary may use the
10 opinions of experts in relevant fields, and may structure the
11 contribution of experts under this title as peer review.

12 "SEC. 408. RECORDS AND AUDITS. -- (a) KEEPING OF RECORDS.
13 -- Each public housing agency receiving grants under this title
14 shall keep such records as may be reasonably necessary to
15 disclose the amount and the disposition of the grant amounts and
16 to ensure compliance with the requirements of this title.

17 "(b) ACCESS TO DOCUMENTS. -- (1) BY THE SECRETARY. -- The
18 Secretary (including the Inspector General of the Department of
19 Housing and Urban Development) shall have access for the purpose
20 of audit and examination to any books, documents, papers, and
21 records of the public housing agency and other entities that are
22 pertinent to assistance received in connection with, and the
23 requirements of, this title.

24 "(2) BY THE COMPTROLLER GENERAL. -- The Comptroller
25 General of the United States, or any of the duly authorized
26 representatives of the Comptroller General, shall also have

1 access for the purpose of audit and examination to any
2 books, documents, papers, and records of the public housing
3 agency or other entities that are pertinent to assistance
4 received under, and the requirements of, this title.

5 "SEC. 409. DEFINITIONS. -- For purposes of this title --

6 "(1) The term 'resident management corporation' means
7 a resident management corporation established in accordance
8 with the requirements of the Secretary under section 20;

9 "(2) The term 'resident council' has the same meaning
10 as the definition of the term in section 306(5)); and

11 "(3) The term 'public housing agency' includes an
12 Indian housing authority, except where otherwise provided.

13 "SEC. 410. REGULATIONS. -- The Secretary is authorized to
14 issue such regulations as may be necessary to carry out this
15 title.".

16 SEC. 302. IMPLEMENTATION. -- The Secretary shall, by notice
17 published in the Federal Register, establish such requirements as
18 may be necessary to carry out the provisions of this title. The
19 Secretary shall issue final regulations based on the initial
20 notice after notice and opportunity for public comment.

21 SEC. 303. REPEALERS AND TRANSITION. -- (a) REPEALERS. --
22 The Public and Assisted Housing Drug Elimination Act of 1990 and
23 section 520 of the Cranston-Gonzalez National Affordable Housing
24 Act are hereby repealed.

25 (b) STATUS OF COMMITMENTS AND GRANTS. -- Beginning with
26 funds appropriated for fiscal year 1994, the Secretary shall not

1 make any new commitments to provide assistance under the
2 authorities referred to in subsection (a). Any assistance
3 heretofore committed to be provided or provided under these
4 authorities shall continue to be governed by the terms of the
5 authorities, notwithstanding subsection (a).

6 (c) STATUS OF AMOUNTS AVAILABLE UNDER REPEALED PROGRAMS. --

7 Any amounts appropriated to carry out the authorities referred to
8 in subsection (a) that are or become available for obligation
9 shall be added to and merged with amounts appropriated to carry
10 out this title. All amounts that are so merged shall be
11 available for the purposes of this title with the amounts that
12 are appropriated for this title.

13 H:\GLL\PRIORITY.94\COMPAC.BIL

**EXECUTIVE OFFICE OF THE PRESIDENT
OFFICE OF MANAGEMENT AND BUDGET**

ROUTE SLIP

TO: Jeff Lischer, HUD

Jose Cerda, DPC

Paul Weinstein, DPC

Steve Redburn, HTF

Chris Heiser, HTF

Cora Beebe, TCJ

Chris Brown, TCJ

Take necessary action ☐

Approval signature ☐

Comment ☐

Prepare reply ☐

Discuss with me ☐

For your information ☐

See remarks below ☐

**FROM: Chris Mustain
(202) 395-3923 fax 395-6148**

DATE: Tue Jul 13, 1993 2:13pm

REMARKS

Attached are DOJ's comments on the Community Partnerships Against Crime proposal in HUD's draft bill, the "Housing and Community Development Act of 1993."

Please review and provide me with your comments by 5:30 Today, July 13th.

**cc: Bob Damus
Paul Carey
Bernie Martin
Janet Forsgren
Connie Bowers**

URGENT URGENT

July 13, 1993

Note for Chris Mustain

From: Greg Jones

Per Grace's discussion w/Chris Edley, here is some discussion material for HUD's draft bill. We have sent a copy to HUD. Sorry for the delay. (Also, HUD Secretary and AG Reno apparently had dinner last night but don't have a report on what's going on.)

Litigation authority still in?

Also -- we have a draft uniform non-judicial foreclosure bill circulating w/in DOJ w/comments due 7/14. We stand by our position that HUD's piecemeal proposal not be cleared.

Thanks.

PS. Grace is our policy-level contact on this. Since she talks to the AG about these matters, any HUD policy-level calls should be referred to her.

DRAFT

Discussion
The Dept. of Justice is

generally concerned about how COMPAC will be coordinated and integrated with other federal, state and local crime prevention and control efforts, (particularly the Enterprise and Empowerment Zones, Weed and Seed sites, and DOJ community policing and policing and public safety initiatives) as well as about coordination with related social services and programs.

The attached suggested language is only one of many possible alternative mechanisms for facilitating coordination with some of the Justice-related programs and eliminating what otherwise appears to be an enormous potential for overlap, duplication of effort or inconsistency with Justice and state/local initiatives. It is also worth noting that in the involvement of U.S. Attorneys and the district Law Enforcement Coordinating Committees (LECCs) in the development of community partnerships against crime would facilitate coordination.

The suggested language change on page 8 assumes that COMPAC assistance will be available to fund direct hires of sworn law enforcement personnel and that good policy demands such assistance be made available on terms similar to those of other new Administration policing initiatives.

*F41**DRAFT*

of the Secretary in relation to grants for the purpose described in paragraph (8) shall be exercised and carried out by the Attorney General in consultation with the Secretary. The Attorney General may utilize the Bureau of Justice Assistance, the United States Attorneys, and any other component or official of the Department of Justice in carrying out the function described in the preceding sentence and the

consultation required under section 5123

07/13/93

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AL 07-14:37

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"(9) youth initiatives, such as activities involving training, education, after school programs, cultural programs, recreation and sports, career planning, and entrepreneurship and employment; and

"(10) resident services programs, such as job training, education programs, and other appropriate social services which address the contributing factors of crime"; and

(8) by striking out subsection (D).

SEC. 123. Section 5123 of such Act is amended --

(1) in subsection (a) --

(A) by adding the paragraph designation "(1)" immediately after "IN WHICH --";

(B) in the first sentence, by striking out ", a public housing resident management corporation,";

(C) in the second sentence, by striking out "drug-related crime on the premises of" and inserting in lieu thereof the following "crime in and around"; and

(D) by adding the following new paragraphs at the end:

"(2) The Secretary shall, by regulation issued after notice and opportunity for public comment, set forth criteria for establishing a class of public housing agencies that have especially severe crime problems. Any public housing agency within this class

8

Notwithstanding section 5123, the authority and responsibilities

1. of the following: (a) ~~investigative~~ and ~~assistance~~

2. ~~housing~~ --

3. (8) by inserting immediately after "used in" in the
4. introductory material the following: "or around";

5. (9) in paragraph (3), by inserting immediately before
6. the semicolon the following: ", such as lawing, lighting,
7. locking, and surveillance systems";

8. (4) by striking paragraph (4)(A) and inserting in lieu
9. thereof the following:

10. "(A) to investigate crime; and";

11. (5) in paragraph (5) --

12. (A) by striking out "in and around public or
13. other federally assisted low-income housing projects";
14. and

15. (B) by striking out "and" after the semicolon;

16. (6) in paragraph (7) --

17. (A) by striking out "where a public housing
18. agency receives a grant";

19. (B) by striking out "drug abuse" and inserting in
20. lieu thereof "crime"; and

21. (C) by striking out the period at the end and
22. inserting in lieu thereof a semicolon

23. (7) by adding the following new paragraph after
24. paragraph (7):

25. "(8) ~~cooperative~~ ~~policing~~ ~~programs~~;

7

the employment or utilization of one or more individuals, including law enforcement officers, made available by contract or other cooperative arrangement with State or local law enforcement agencies, to engage in community and problem-oriented policing involving interaction with members of the community on proactive crime control and prevention;

07/13/93

16:36

(3) target opportunities for long-term commitment of funding primarily to public housing agencies with serious crime problems;

(4) encourage the involvement of a broad range of community-based groups, and residents of neighboring housing that is owned or controlled by the Secretary, in the development and implementation of anti-crime plans;

(5) provide training, information services, and technical assistance to program participants; and

(6) establish a standardized assessment system to evaluate need among public housing agencies, and to measure progress in meeting crime reduction goals.

"SEC. 5125. PURPOSE OF THIS CHAPTER."

"The Secretary of Housing and Urban Development, in accordance with the provisions of this chapter, may make grants (1) to public housing agencies (including Indian housing authorities) and (2) using amounts appropriated for fiscal year 1994 only, to private, nonprofit and nonprofit owners of federally assisted low-income housing, the use in eliminating crime in and around public and other federally assisted low-income housing projects."

in consultation with the Attorney General and

Reduce crime and disorder in and around public housing through the expansion of community-oriented policing and problem solving activities

6

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07/13/93 17:42

OMB LRD/LWP

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RE: 00-1214900

(Final Title II)

SUBTITLE C -- COMMUNITY PARTNERSHIPS AGAINST CRIME

SEC. 100. (a) Section 100 of the Anti-Drug Abuse Act of

1988 is amended --

(1) by striking out "CHAPTER 2 -- PUBLIC AND ASSISTED HOUSING DRUG ELIMINATION" and inserting in lieu thereof the following: "CHAPTER 2 -- COMMUNITY PARTNERSHIPS AGAINST CRIME";

(2) by striking out "Congressional findings." and inserting in lieu thereof the following: "Purposes:"

and

(3) by adding after "Sec. 112. Authorization of appropriations." the following: "Sec. 113. Technical assistance."

(b) The heading for chapter 2 of title V of the Anti-Drug Abuse Act of 1988 is amended to read as follows: "CHAPTER 2 -- COMMUNITY PARTNERSHIPS AGAINST CRIME".

SEC. 101. Sections 111, 112, and 113 of the Public and ASSISTED HOUSING Drug Elimination Act of 1988 are amended to read as follows:

"SEC. 111. SHORT TITLE--

"This chapter may be cited as the 'Community Partnerships Against Crime Act of 1993'."

"SEC. 112. PURPOSES--

"The purposes of this chapter are to --

"(1) substantially expand and enhance the Federal government's commitment to eliminating crime in public housing;

subtitle C of

5

1992
Department of Housing and Urban Development
Public Housing Drug Elimination Program (PHDEP)
Funding Breakdown

FIELD	TOTAL AMOUNT	PERCENTAGE
Law Enforcement	\$37,449,461	27%
Security Personnel	\$16,390,925	12%
Investigators	\$2,954,153	2%
Tenant Patrols	\$1,473,520	1%
Physical Improvements	\$5,694,955	4%
Drug Prevention	\$47,645,651	34%
Drug Intervention	\$12,412,812	9%
Drug Treatment	\$7,313,369	5%
Other Costs/Indirect	\$9,215,154	6%
Totals	\$140,550,000	100%

1992
Department of Housing and Urban Development
Public Housing Drug Elimination Program (PHDEP)
Funding Breakdown

FIELD	TOTAL AMOUNT	PERCENTAGE
Law Enforcement	\$37,449,461	27%
Security Personnel	\$16,390,925	12%
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Drug Prevention	\$47,645,651	34%
Drug Intervention	\$12,412,812	9%
Drug Treatment	\$7,313,369	5%
Other Costs/Indirect	\$9,215,154	6%
Totals	\$140,550,000	100%

PHOTOCOPY
PRESERVATION

EXECUTIVE OFFICE OF THE PRESIDENT
OFFICE OF MANAGEMENT AND BUDGET
Washington, D.C. 20503

URGENT

July 16, 1993

LEGISLATIVE REFERRAL MEMORANDUM

LRM #D-312
DRAFT #283

TO: Legislative Liaison Officer -

(COMPAC only) - TREASURY - Richard S. Carro - (202)622-1146 - 228
- JUSTICE - Sheila F. Anthony - (202)514-2141 - 217
- NEC - Sonia Mathews - (202)456-6722 - 429

FROM: JANET R. FORSGREN (for) *Janet R. Forsgren*
Assistant Director for Legislative Reference

OMB CONTACT: Chris MUSTAIN (395-3923)
Secretary's line (for simple responses): 395-7362

SUBJECT: HUD Draft Bill Housing and Community
Development Act of 1993

DEADLINE: 12:00 NOON July 19, 1993

COMMENTS: HUD would like to transmit the attached "fast-track"
version of the draft bill on Tuesday, July 20th; therefore,
THE ABOVE DEADLINE IS FIRM.

OMB requests the views of your agency on the above subject before
advising on its relationship to the program of the President, in
accordance with OMB Circular A-19.

Please advise us if this item will affect direct spending or
receipts for purposes of the the "Pay-As-You-Go" provisions of
Title XIII of the Omnibus Budget Reconciliation Act of 1990.

CC:
Ken Ryder
Steve Redburn (2)
Trish Walsh
Paul Carey
Paul Weinstein
Janet Forsgren

Attn: Jose Cerda
(COMPAC only)

1 **SUBTITLE C -- COMMUNITY PARTNERSHIPS AGAINST CRIME**

2 **TECHNICAL PROVISIONS**

3 **SEC. 280.** (a) Section 5001 of the Anti-Drug Abuse Act of
4 1988 is amended --

5 (1) by striking "CHAPTER 2 -- PUBLIC AND ASSISTED
6 HOUSING DRUG ELIMINATION" and inserting in lieu thereof the
7 following: "CHAPTER 2 -- COMMUNITY PARTNERSHIPS AGAINST
8 CRIME";

9 (2) by striking "Congressional findings." and
10 inserting in lieu thereof the following: "Purposes."; and

11 (3) by adding after "Sec. 5130. Authorization of
12 appropriations." the following: "Sec. 5131. Technical
13 assistance.".

14 (b) The heading for chapter 2 of subtitle C of title V of
15 the Anti-Drug Abuse Act of 1988 is amended to read as follows:
16 "CHAPTER 2 -- COMMUNITY PARTNERSHIPS AGAINST CRIME".

17 **SHORT TITLE, PURPOSES, AND AUTHORITY TO MAKE GRANTS**

18 **SEC. 281.** Sections 5121, 5122, and 5123 of the Public and
19 Assisted Housing Drug Elimination Act of 1990 are amended to read
20 as follows:

21 **"SEC. 5121. SHORT TITLE.**

22 "This chapter may be cited as the 'Community
23 Partnerships Against Crime Act of 1993'.

1 **"SEC. 5122. PURPOSES.**

2 "The purposes of this chapter are to --

3 "(1) substantially expand and enhance the Federal
4 government's commitment to eliminating crime in public
5 housing;

6 "(2) broaden the scope of the Public and Assisted
7 Housing Drug Elimination Act of 1990 to apply to all
8 types of crime, and not simply crime that is drug-
9 related;

10 "(3) target opportunities for long-term
11 commitments of funding primarily to public housing
12 agencies with serious crime problems;

13 "(4) encourage the involvement of a broad range
14 of community-based groups, and residents of neighboring
15 housing that is owned or assisted by the Secretary, in
16 the development and implementation of anti-crime plans;

17 "(5) reduce crime and disorder in and around
18 public housing through the expansion of community-
19 oriented policing activities and problem solving;

20 "(6) provide training, information services, and
21 other technical assistance to program participants; and

22 "(7) establish a standardized assessment system
23 to evaluate need among public housing agencies, and to
24 measure progress in reaching crime reduction goals.

25 **"SEC. 5123. AUTHORITY TO MAKE GRANTS.**

"The Secretary of Housing and Urban Development, in accordance with the provisions of this chapter, may make grants (1) to public housing agencies (including Indian housing authorities) and (2) using amounts appropriated for fiscal year 1994 only, to private, for-profit and nonprofit owners of federally assisted low-income housing, for use in eliminating crime in and around public and other federally assisted low-income housing projects. In designing the program, the Secretary shall consult with the Attorney General."

ELIGIBLE ACTIVITIES

SEC. 282. Section 5124 of such Act is amended --

(1) by striking "(a) PUBLIC AND ASSISTED HOUSING. --";

(2) by inserting immediately after "used in" in the introductory material the following: "and around";

(3) in paragraph (3), by inserting immediately before the semicolon the following: ", such as fencing, lighting, locking, and surveillance systems";

(4) by striking paragraph (4)(A) and inserting in lieu thereof the following new subparagraph:

"(A) to investigate crime; and";

(5) in paragraph (6) --

(A) by striking "in and around public or other federally assisted low-income housing projects"; and

(B) by striking "and" after the semicolon;

(6) in paragraph (7) --

1 (A) by striking "where a public housing agency
2 receives a grant,";

3 (B) by striking "drug abuse" and inserting in
4 lieu thereof "crime"; and

5 (C) by striking the period at the end and
6 inserting in lieu thereof a colon;

7 (7) by adding the following new paragraphs after
8 paragraph (7):

9 "(8) the employment or utilization of one or more
10 individuals, including law enforcement officers, made
11 available by contract or other cooperative arrangement
12 with State or local law enforcement agencies, to engage
13 in community- and problem-oriented policing involving
14 interaction with members of the community on proactive
15 crime control and prevention;"

16 "(9) youth initiatives, such as activities
17 involving training, education, after school programs,
18 cultural programs, recreation and sports, career
19 planning, and entrepreneurship and employment; and

20 "(10) resident service programs, such as job
21 training, education programs, and other appropriate
22 social services which address the contributing factors
23 of crime."; and

24 (8) by striking subsection (b).

25 **APPLICATIONS**

26 **SEC. 283.** Section 5125 of such Act is amended --

1 (1) in subsection (a) --

2 (A) by adding the paragraph designation "(1)"
3 immediately after "IN GENERAL.--";

4 (B) in the first sentence, by striking ", a
5 public housing resident management corporation,";

6 (C) in the second sentence, by striking "drug-
7 related crime on the premises of" and inserting in lieu
8 thereof the following: "crime in and around"; and

9 (D) by adding the following new paragraphs at the
10 end:

11 "(2) The Secretary shall, by regulation
12 issued after notice and opportunity for public
13 comment, set forth criteria for establishing a
14 class of public housing agencies that have
15 especially severe crime problems. Any public
16 housing agency within this class may submit an
17 application for a one-year grant under this
18 chapter that, subject to the availability of
19 appropriated amounts, shall be renewed for a
20 period not exceeding the four subsequent years:
21 Provided, That the Secretary finds, after an
22 annual or more frequent performance review, that
23 the public housing agency is performing under the
24 terms of the grant and applicable laws in a
25 satisfactory manner and meets such other
26 requirements as the Secretary may prescribe.

1 "(3) Any eligible applicant may submit an
2 application for a grant for a period of up to two
3 years. The Secretary may accord a preference to
4 applications seeking a subsequent grant under this
5 paragraph if the grant is to be used to continue
6 or expand activities assisted under a previous
7 grant under this paragraph and the Secretary finds
8 that the applicant's program under the prior grant
9 is being managed soundly and demonstrates success:
10 Provided, That the extent of any preference that
11 the Secretary so accords shall not unreasonably
12 prejudice the opportunities of other public
13 housing agencies to be awarded grants under this
14 paragraph.";

15 (2) in subsection (b) --

16 (A) in the introductory material, by striking
17 "subsections (c) and (d)" and inserting in lieu thereof
18 "subsections (a) and (c)";

19 (B) in paragraph (1), by striking "drug-related
20 crime problem in" and inserting in lieu thereof the
21 following: "crime problem in and around";

22 (C) in paragraph (2), by inserting immediately
23 after "crime problem in" the following: "and around";
24 and

25 (D) in paragraph (4), by inserting after "local
26 government" the following: ", local community-based

1 non-profit organizations, local resident organizations
2 that represent the residents of neighboring projects
3 that are owned or assisted by the Secretary,";

4 (3) in subsection (c)(2) by striking "drug-related"
5 the two places it appears; and

6 (4) by striking subsection (d).

7 DEFINITIONS

8 SEC. 284. Section 5126 of such Act is amended by striking
9 paragraphs (1) and (2), and renumbering paragraphs (3) and (4) as
10 paragraphs (1) and (2), respectively.

11 IMPLEMENTATION

12 SEC. 285. Section 5127 of such Act is amended by striking
13 "Cranston-Gonzalez National Affordable Housing Act" and inserting
14 in lieu thereof "Housing and Community Development Act of 1993".

15 REPORTS

16 SEC. 286. Section 5128 of such Act is amended by striking
17 "drug-related crime in" and inserting in lieu thereof the
18 following: "crime in and around".

19 AUTHORIZATION OF APPROPRIATIONS

20 SEC. 287. Section 5130 of such Act is amended --

21 (1) in the first sentence of subsection (a), by
22 striking "\$175,000,000 for fiscal year 1993" and all that
23 follows and inserting in lieu thereof: "\$265,000,000 for
24 fiscal year 1994 and \$325,000,000 for fiscal year 1995.";

25 (2) in subsection (b) --

1 (A) by striking "SET-ASIDES" and inserting in
2 lieu thereof "SET-ASIDE";

3 (B) by striking the first sentence;

4 (C) by striking "drug elimination";

5 (D) by striking "fiscal years 1993 and 1994" and
6 inserting in lieu thereof "fiscal year 1994"; and

7 (E) by striking "and 5.0 percent" and all that
8 follows through the end of the sentence and inserting
9 in lieu thereof a period; and

10 (3) by striking subsection (c) and section 520(k) of
11 the Cranston-Gonzalez National Affordable Housing Act.

12 **TECHNICAL ASSISTANCE**

13 SEC. 288. Such Act is further amended by adding at the end
14 thereof the following new section:

15 **"SEC. 5131. TECHNICAL ASSISTANCE.**

16 "Of the amounts appropriated annually for each of
17 fiscal years 1994 and 1995 to carry out this chapter, the
18 Secretary is authorized to use up to \$10,000,000, directly
19 or indirectly, under grants, contracts, cooperative
20 agreements, or otherwise, to provide training, information
21 services, and other technical assistance to public housing
22 agencies and other entities with respect to their
23 participation in the program authorized by this chapter.
24 Such technical assistance may include the establishment and
25 operation of the clearinghouse on drug abuse in public
26 housing and the regional training program on drug abuse in

1 public housing under sections 5143 and 5144 of this Act.
2 The Secretary is also authorized to use the foregoing
3 amounts for obtaining assistance in establishing and
4 managing assessment and evaluation criteria and
5 specifications, and obtaining the opinions of experts in
6 relevant fields.".

7
8
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10

SUBTITLE C -- COMMUNITY PARTNERSHIPS AGAINST CRIME

Subtitle C would amend the Public and Assisted Housing Drug Elimination Act of 1990 to create an expanded program entitled, "Community Partnerships Against Crime Act of 1993." Under the revised program, HUD would be authorized to make grants to public housing agencies (including Indian housing authorities) and federally assisted housing projects for use in carrying out activities to implement plans for crime suppression, intervention, and prevention in and around such housing projects. There follows an explanation and justification for the proposal.

Problem Statement

Local officials, PHAs, and HUD share the responsibility of providing safe and decent housing for public and Indian housing residents. Housing in many areas suffers from rampant crime, which may include gangs or drug dealers imposing a reign of terror on local residents. The increase in crime activity has not only led to fear and acts of violence against residents, but also to a deterioration of the physical environment resulting in substantial government expenditures.

Crime is no longer limited to America's largest cities. The problems of crime and drugs have spread to the smaller cities and suburbs. Federal Bureau of Investigation data show significant increases in violent crimes against persons and crimes against property since 1985 in both large and small urban areas.

Purposes

The proposal would establish the following new purposes:

- (1) To substantially expand and enhance the Federal government's commitment to eliminating crime in public housing.
- (2) To broaden the scope of the Public and Assisted Housing Drug Elimination Act to apply to all types of crime, not simply crime that is drug-related.
- (3) To target opportunities for long-term commitments of funding to PHAs with serious crime problems.
- (4) To encourage involvement of a broad range of community-based groups, and residents of neighboring HUD-owned or assisted housing, in the development and implementation of anti-crime plans.
- (5) To provide training, information services, and other technical assistance to program participants.

(6) To establish a standardized assessment system to evaluate need among PHAs and to measure progress in achieving crime reduction goals.

Program Response

This proposal would establish an expanded program to address the issue of crime in public and Indian housing communities. The program, known as COMPAC, would organize PHAs, residents, and police as a community force in the development of comprehensive plans to counter crime in their neighborhoods.

The program would rewrite the existing Public and Assisted Housing Drug Elimination Act. The revised program would expand to include a much wider variety of crime reduction, security enhancement, and other efforts to impact violence, substance abuse, and gang related activities.

The funding level of the expanded program would be \$255 million in grants for FY 1994. Of this amount, 6.25% would be designated for federally assisted housing programs. This set-aside would only be made available in FY 1994, after which funding for needed security costs would be addressed through rent adjustments and other existing HUD programs.

The FY 1995 budget request would be \$315 million. An additional \$10 million would be made available each year in FY 1994 and FY 1995 for technical and related assistance, including development of an assessment tool to determine the nature and extent of crime in any given community; the provision of technical assistance, training, and information dissemination; and evaluation of the assessment tool.

Expanded Focus of Program

The program would focus resources on areas of greatest assessed need; be flexible enough to respond to the circumstances in each given community; provide a cost-effective funding system; and establish standards for enforcement which define and clarify the roles of local officials, enforcement personnel, PHAs, and residents.

In order to provide greater certainty of continued funding for those PHAs with especially severe problems, the Act would give HUD the authority to provide renewable grants to PHAs with serious crime problems, subject to the availability of appropriations. To renew a grant HUD would be required to perform an annual performance review and determine that the grantee's performance is satisfactory. Grants to other PHAs would be for terms of two years.

HUD would be authorized to define a class of PHAs with characteristics that HUD determines correlate directly with

serious crime problems, and make all PHAs within this class eligible for grants that are renewable for up to a total of five years, subject to the annual performance review and appropriations.

HUD would also be authorized to grant a scoring preference to applicants who seek funding to continue anti-crime programs for up to two year grants, but only if the anti-crime program is being well implemented and has demonstrated success, and if HUD determines such preference would not unreasonably limit other PHAs that obtain passing scores.

PHAs would be encouraged to involve other agencies and community-based organizations to carry out activities and to leverage additional resources, programs, and expertise. Applicants would receive additional scoring points for participation of the local community in the development and delivery of program services.

The list of eligible uses of grant funds would be expanded beyond the existing eligible activities to include the following:

- o Community Policing would be an eligible activity. This approach has been effective in regaining control of crime-ridden neighborhoods. The provision of police officers to specific neighborhoods on a consistent basis builds relationships with residents, thereby increasing information exchange which deters and prevents crime. Residents become less fearful of reporting crime and, therefore, participate in solutions to address crime problems. Foot or bicycle patrols, police substations in public housing, community relations officers, and other techniques which put the officer in more direct contact with the community have demonstrated results in reducing crime statistics.
- o Youth Initiatives would recognize public housing youth as an essential resource in solving community problems. Their enlistment can, in itself, be good prevention-programming. Youth can be coaches in recreational programs, peer mentors, and leaders in community solution action planning. More emphasis could be placed on training, education, recreation, career planning, employment, and substance abuse education and prevention. Youth programming should provide the opportunities, skills, and information needed for youth to make appropriate life-style choices and offer a deterrence to gang activity. The chapter would specifically authorize use of grants for youth initiatives such as training, education, after school activities, tutoring, recreation, career planning, employment and entrepreneur programs.

- o Resident Services Programs provide comprehensive resident services to effectively intervene and prevent crime activities in public housing populations. Services may include job training, educational programs, treatment, or other appropriate social services which address the contributing factors of crime.
- o Physical Security Hardware costs, such as fencing, lighting, locking and surveillance systems, would be allowable.

Technical Assistance

A variety of services would be initiated to provide support which fosters creativity and reinforces success. Support services would include program technical assistance, training, information dissemination, and evaluation. From the amounts appropriated for FY 1994 and FY 1995, \$10 million would be used for the development and delivery of the following activities:

- o Development of a standardized assessment tool to assess the extent and nature of crime to be used in the initial application to demonstrate need and to serve as a baseline to track and evaluate outcome measures.
- o Development and delivery of technical assistance, training, and information services to share and promote effective programs.
- o Issuing evaluation contracts for an objective review of program effectiveness which incorporates the tracking of baseline data.

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Associates Inc.

**PUBLIC HOUSING
DRUG
ELIMINATION
PROGRAM
EVALUATION**

**VOLUME 1:
FINDINGS**

DU100C9000005860

August 20, 1993

Submitted to:

**Mr. Harold Williams
U.S. Department of Housing
and Urban Development
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EXECUTIVE SUMMARY

Background

Congress authorized the Public Housing Drug Elimination Program (PHDEP) as part of the Anti-Drug Abuse Act of 1988, to help public housing agencies and Indian housing authorities combat drug use and drug-related crime in their developments. To date, Congress has appropriated five rounds of funding for PHDEP grants: \$8.2 million in FY 1989; \$97.4 million in FY 1990; \$140.8 million in FY 1991; \$140.6 million in FY 1992; and \$145.5 million in FY 1993. This evaluation of PHDEP (conducted by Abt Associates Inc., with its subcontractors OKM Associates and TAG Associates, under contract to the U.S. Department of Housing and Urban Development) covers the 617 grantees (897 separate grants) funded during PHDEP Rounds 1 through 3 (FY1989-1991). These grants ranged in size from \$7,857 to \$12.5 million.

Evaluation Methodology

Carried out between July 1991 and July 1993, this evaluation examines local PHDEP program implementation and impacts and also offers recommendations regarding the national and local programs. It is based on data collection and analysis at two levels: the PHDEP program nationwide and fifteen local programs selected for intensive study. The final report presents a cross-site analysis of the fifteen intensive-study programs, along with the analysis of the nationwide survey of PHDEP grantees. Detailed case studies of the fifteen intensive-study programs have also been prepared. These case studies provide an extended analysis of the context, design, implementation, and impacts of each of the fifteen programs.

The PHDEP Program Nationwide

Analysis of the PHDEP program nationwide in Rounds 1 through 3 was conducted using information from a grantee database maintained for HUD by Aspen Systems and a mail survey conducted by Abt Associates as part of this evaluation contract. The mail survey, carried out between January and March 1993, achieved a response rate of 78 percent (481 of 617 grantees). No statistically significant differences were detected between the respondents and the grantee

universe, in terms of housing authority size, grant size, or geographic region. Thus, the survey respondents are highly representative of the universe of grantees.

The survey gathered data on local programs' HUD-approved plans and the actual implementation status of all activities, according to major strategy areas: law enforcement/security; physical improvements; drug prevention; drug treatment; and Resident Management Corporation/Resident Council programs. The survey sought a range of other information as well, covering such topics as the availability and use of non-PHDEP funding support for anti-drug efforts, implementation obstacles and solutions, extent of resident involvement, and self-assessment of program effectiveness and positive changes achieved.

Key findings regarding the nationwide program include the following:

Description of Grantee Agencies

- The average grantee agency was larger than the average size across all housing authorities; 48 percent of grantees were small agencies (less than 500 units), 28 percent were medium-sized (up to 1,250 units), and the remaining 23 percent were large;
- 53 percent of grantees were in the South Census region, 18 percent in the Northeast, 17 percent in the Midwest, and 12 percent in the West. In general, coastal areas were over-represented among grantees relative to all PHAs, while central areas received smaller shares;
- The nature and intensity of drug problems vary across regions of the country and across agencies of different sizes as well (probably because larger agencies are typically situated in large urban areas). Large grantees reported gang-related problems much more frequently than did small ones.

PHDEP Strategies

- Faced with different needs, grantees adopted a wide variety of strategies;
- The most commonly implemented activities were drug education (80 percent of all programs), youth sports and recreation (71 percent), and youth education and tutoring (64 percent);
- Law enforcement/security activities received the largest share of funds (47 percent); the prevention area received 38 percent; physical improvements, 6 percent; drug treatment, 6 percent; and resident initiatives, 4 percent;
- Over time, the share of funds allocated to law enforcement/security declined, while that for treatment/intervention rose. Over a third of the grantees emphasizing

security in their first grants shifted to mixed or prevention programs in their second grants;

- One-third of grantees chose mixed security-prevention programs; one fourth chose security-oriented programs; 22 percent selected prevention-oriented programs; and 19 percent opted for mixed security, prevention and physical improvements;
- Small agencies adopted security-oriented programs more commonly than did larger ones, while larger agencies adopted mixed programs more commonly than did smaller ones; and
- Among repeat grantees, most adopted the same type of program under their second grant; those that changed strategies tended to shift away from security-oriented and towards prevention-oriented or mixed programs.

Other Anti-Drug Efforts

- 70 percent of all grantees had used funds from non-PHDEP sources to support prior or ongoing anti-drug initiatives;
- 73 percent received in-kind support for their anti-drug programs; and
- Most common other funding sources were CIAP (the Comprehensive Improvements Assessment Program), Comprehensive Grant Program, public housing operating funds, and local governments.

Targeting of Developments

- Grantees took a wide range of approaches to targeting, spending from \$17.50 to \$5,000 in PHDEP funds per targeted housing unit; and
- The average percentage of units targeted by PHDEP grantees rose from 60 percent in Round 1 to 76 percent in Round 3, but mean funding per targeted unit also rose, from \$416 to \$549, as the Congressional appropriations for PHDEP increased.

Resident Involvement

- One-fifth of programs included support for activities operated by resident councils or resident management corporations, or general support for these organizations;
- Residents were most commonly involved in planning and reviewing activities, somewhat less involved in implementation, and only very rarely involved in hiring decisions; and
- Of strategy areas, residents appear to have been most involved in drug prevention activities.

Implementation

- 84 percent of grantees reported at least one implementation obstacle;
- Grantees focusing on law enforcement/security activities reported fewer problems than those focusing on prevention;
- The most common problem was low resident participation, followed by funding shortages and staffing problems;
- The activity most commonly canceled was resident patrols, which reflects in part the broader difficulties with resident involvement and in part the unique challenges of the resident patrol concept; and
- 26 percent of grantees felt their implementation timetables were unrealistic.

Local Program Effectiveness

- Grantees typically used informal assessment measures, such as observing conditions at their developments (92 percent) or examining crime statistics (83 percent);
- Fewer than one third of all grantees conducted formal evaluations of their programs;
- Activities under the physical improvements area were most commonly rated by grantees as very effective, followed by activities under security, drug prevention, resident initiatives, and drug treatment;
- When asked to specify the single most effective activity, grantees most commonly picked one under security, followed by drug prevention, resident initiatives, drug treatment, and physical improvements; while physical improvements are commonly viewed as very effective, they were rarely seen as pivotal to a program's success;
- Activities under drug treatment and prevention were those most frequently mentioned as the least effective;
- Initiatives undertaken by the police were viewed as the most effective of those within the security area, while those most dependent on resident involvement (resident patrols and neighborhood watch programs) were reported as the least successful;
- Prevention activities targeted to youth tended to be rated the most effective, while those targeted to adults (especially jobs programs) were rated as the least effective;
- Nearly one fourth of grantees listed some form of resident involvement as the least effective of all their activities;

- Despite the indications that gaining and maintaining resident involvement can be problematic to a local PHDEP program, higher levels of reported resident involvement were associated with higher levels of perceived effectiveness; and
- While involving residents in activities is challenging, successfully doing so can be a key to program success.

Sustainability

- One-half of grantees reported that their prospects for continuing anti-drug efforts without PHDEP funding were poor; only 11 percent said they were excellent.

Fifteen Local Programs Selected for Intensive Study

The study also examined in detail the degrees of success achieved, and the factors affecting success, in fifteen local programs. These programs represent a purposive, rather than a random, sample chosen with reference to the following dimensions: PHDEP rounds in which funded; size and type of housing authority; region; and mix of drug elimination strategies. Since this was not a random sample, statistically valid inferences about the programs as a whole cannot be drawn from the experience of the fifteen. However, because of the range of dimensions covered in the selected sites, the study was able to identify patterns and ranges of impact and program success.

The fifteen intensive-study sites were: Charlottesville, Virginia; Chicago, Illinois; Dade County (Miami), Florida; Denver, Colorado; Jersey City, New Jersey; Los Angeles, California; Madison, Wisconsin; Oakland, California; Pittsburgh, Pennsylvania; Portland, Maine; Portland, Oregon; San Antonio, Texas; Savannah, Georgia; Springfield, Massachusetts; and Yakima Nation, Washington.

Evaluation of these fifteen programs was based on data from three sources: (1) two rounds of site visits with extensive interviews of grantee housing agency officials and many others involved in local anti-drug efforts; (2) three periods of observation and interviews with residents in one PHDEP-targeted development in each site, conducted by trained ethnographers; and (3) secondary data (crime statistics, public housing management indicators, and participation statistics for PHDEP-supported activities) and documentary materials (grant applications, progress reports, and internal program documents). Data collection from these sources took place between December 1991 and March 1993.

Exhibit ES.1 displays a conceptual model for assessing the success of these local PHDEP programs. As displayed in the right-hand box of Exhibit ES.1, the study has adopted a multi-dimensional definition of success, which includes not only obviously sought impacts such as reduced crime and drug use, but also a range of other interrelated outcomes including improvements in residents' quality of life, enhanced resident empowerment, better linkages and communication between the housing authority and other entities involved in anti-drug efforts, broader neighborhood effects, and sustainability of impacts. These comprise both interim and final outcomes, with the interim outcomes (such as resident empowerment and linkages) seen as prerequisites for achieving the final outcomes (such as elimination of drug use and drug-related crime).

Exhibit ES.1 also shows, in simplified schematic form, how levels of success (positive impacts) can be better understood with reference to a complex and inter-related set of contextual, design, and implementation factors. Different combinations of these factors helped to produce different levels of success in each local program.

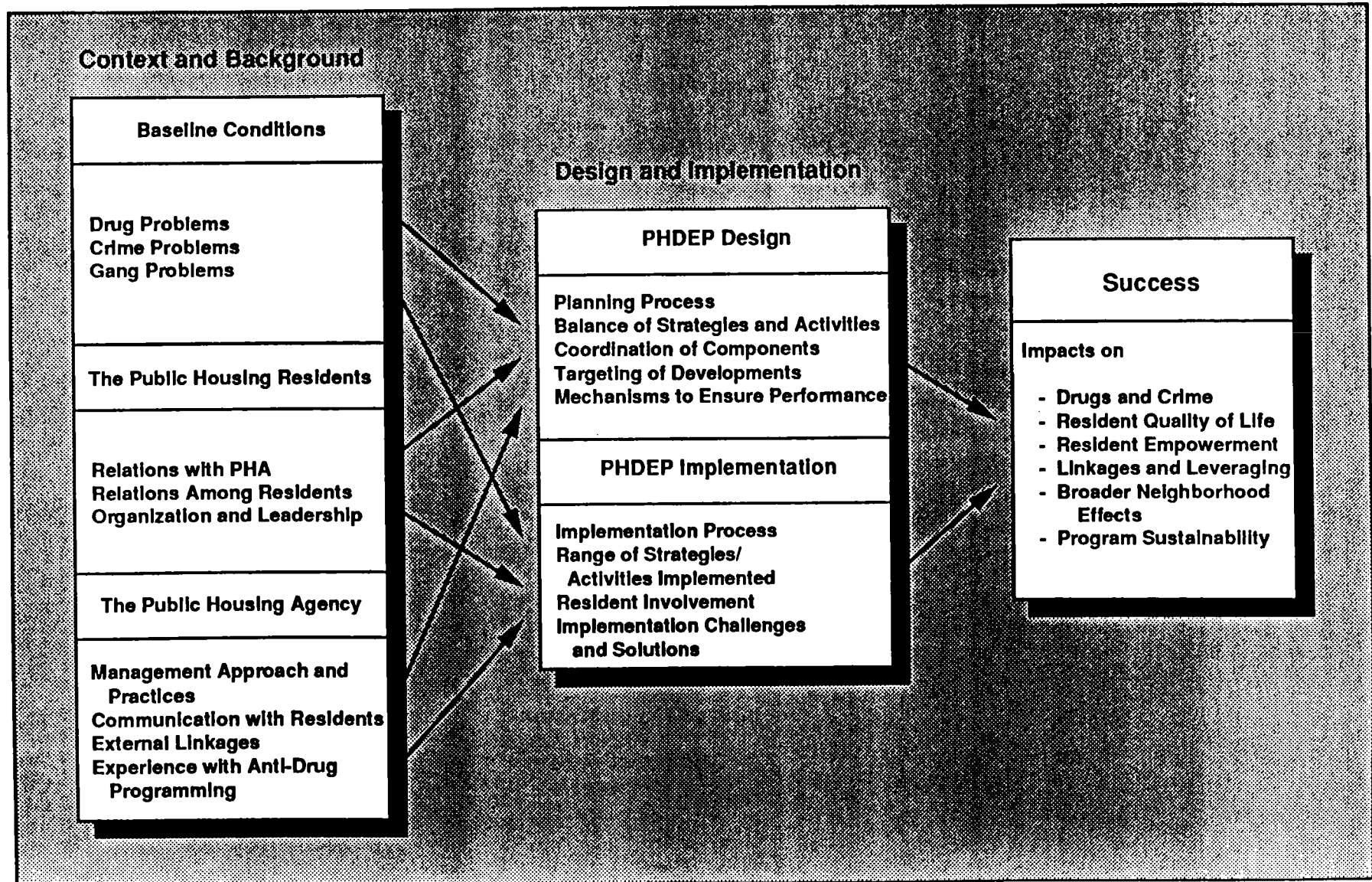
The fifteen intensive-study programs were assigned the following ratings: four were rated successful (Madison, both Portlands, and Savannah); six were rated as moderate or mixed successes (Chicago, Denver, Jersey City, Los Angeles, Springfield, and Yakima Nation); and five were rated as unsuccessful (Charlottesville, Dade County, Oakland, Pittsburgh, and San Antonio). Below, we summarize the impact evidence supporting the assessments of success level (that is, *why* these programs were rated as they were) and the evidence regarding context, design, and implementation (that is, *how* the programs achieved the different levels of success they did).

Program Impacts. Key impacts in the fifteen intensive-study local programs include the following:

- At least some *reduction in open-air drug activity was noted in ten sites*, although changes varied across developments and were often quite fragile; in many cases, *drug activity continued but simply moved under cover*.
- At least some *increased feelings of safety and freedom of movement* were discerned among residents *in eleven sites*, although again there were significant variations by development, and improvements could be quite tenuous.

Exhibit ES.1

Conceptual Model of PHDEP Success



- ***Increased levels of resident empowerment*** and expanded opportunities for resident leadership were noted ***in seven sites***; these included residents running PHDEP components, holding key PHDEP jobs, serving on program monitoring committees, and participating in leadership training.
- ***In seven sites, improved linkages*** between the grantee agencies and other local agencies (including police, schools, and private service provider agencies) were found.

Exhibit ES.2 summarizes the evidence of positive impacts in the fifteen intensive-study sites, showing the ratings of high, medium, or low (H, M, or L) assigned by the research team in each of the impact areas. The combination of ratings across the six impact areas forms the basis for the overall ratings among the fifteen sites according to the study's multi-dimensional definition of success. The combinations of high, medium, and low ratings suggest three groupings. Four sites—Madison, Portland (ME), Portland (OR), and Savannah—have been rated as high on most of the impacts and at least medium on all of them. (With regard to sustainability, no site is ranked as high, because no agency among the fifteen has leveraged the financial resources needed to continue the scale of effort supported by PHDEP. Even rating these four sites as medium may be optimistic, although there are hopeful elements in the linkages and financial support from other agencies and the strength of resident involvement.) These four sites show strengths across the full range of impacts examined in this study and are therefore rated as successful.

The story is more complex for the six sites that fall into the category of mixed or moderate success. Indeed, there are various stories here: some involve major differences among targeted developments in the PHDEP impacts achieved (Los Angeles, Denver, Chicago); others involve problems in design and implementation that hampered what the program could achieve (Springfield, Yakima Nation); and there are also sites where—because significant reductions in drug activity and drug-related crime had occurred before PHDEP—the incremental impact of PHDEP was modest (Jersey City, Yakima Nation). Several of these sites achieved high impacts in one area but more modest ones otherwise.

The group of five sites that conducted unsuccessful PHDEP programs did not achieve high impacts in any of the six areas and received predominantly low ratings across the full set. The severity of baseline crime and drug conditions was certainly a factor making the task very difficult for some (Dade County, Oakland, San Antonio), and internal management problems and

Exhibit ES.2
Summary of PHDEP Impacts at 15 Intensive-Study Sites

Site ^a	Changes in Drugs & Crime	Changes in Quality of Life	Resident Empower- ment	Linkages & Communi- cation	Broader Neighbor- hood Effects ^b	Sustain- ability of Impacts
Successful PHDEP Programs^c						
Madison, WI	M	H	H	H	M	M
Portland, ME	H	H	H	H	H (+)	M
Portland, OR	H	H	H	H	H (+)	M
Savannah, GA	H	H	H	M	M	L/M
Mixed or Moderately Successful PHDEP Programs^c						
Chicago, IL	M	M	H	M	M	L/M
Denver, CO	M	M	M	H	—	L
Jersey City, NJ	M	M	M	H	—	L
Los Angeles, CA	M	M	M	M	—	L
Springfield, MA	M	L	L	M	L (-)	L
Yakima Nation, WA	M	H	M	M	—	L
Unsuccessful PHDEP Programs^c						
Charlottesville, VA	M	L	L	L	L (-)	L
Dade County, FL	L	L	M	M	L (-)	L
Oakland, CA	L	L	L	M	—	L
Pittsburgh, PA	L	L	M	M	L (-)	L
San Antonio, TX	L	L	L	M	M	L

KEY: H high, M medium, L low

^a Sites are listed in alphabetical order within groups.

^b Plus signs (+) indicate positive neighborhood effects, minus signs (-) indicate negative neighborhood effects.

M indicates mixed positive and negative effects.

^c Conclusions are based on analysis of crime statistics, on-site interviews, and ethnographic data.

negative relations with residents impeded the effort in other places (Charlottesville, Pittsburgh). There were also significant flaws in PHDEP design and implementation that prevented the efforts of many individuals and the substantial expenditure of resources in these five sites from having the desired impacts.

Program Context, Design, and Implementation

Local program success among the fifteen intensive-study sites was influenced by a complex interplay of context, design, and implementation factors. The following are some key cross-site themes in this evidence:

Context

- All sites suffered, to a greater or lesser extent, from the *upsurge of drug activity* during the 1980s, as well as the *increasing impoverishment of public housing resident populations*;
- *A wide range of baseline problems* of drugs, crime, and gangs are represented among the fifteen sites, from extremely violent, gang-ridden developments to developments in which residents leave their front doors unlocked;
- Several sites had experienced *improvements in the drug and crime situation prior to PHDEP*, as a result of housing authority efforts or community-wide programs;
- Some of the PHAs among the fifteen are *extremely well-managed agencies* that are receptive to, and encouraging of, resident leadership and resident involvement, while *others are poorly managed* with little integration of resident involvement or drug elimination into the overall management approach or practices;
- Among the fifteen sites, there is a *wide-ranging history of resident organization and involvement*, from the extremely active and influential to the virtually moribund; in many instances, even where there is strong resident leadership, rank-and-file participation is quite shallow; and
- Some of the sites had *wide-ranging linkages* and support among government agencies and other outside organizations, while *others were operating essentially in isolation*, with few linkages and little outside support in anti-drug efforts.

Program Design

- Five of the fifteen sites used PHDEP to *continue or build on existing anti-drug programs*;
- Some agencies employed *broadly inclusive* planning processes for PHDEP, including residents and a range of involved entities, while other agencies used very narrow processes; and
- Most of the fifteen sites proposed *well-balanced* programs, although some were weak in coordination and monitoring functions.

Program Implementation

- The *implementation process* in the fifteen sites ranged from extremely smooth and efficient to very poor and uncoordinated;
- Most sites were able to implement their *law enforcement/security components*;
- More difficulty was encountered in implementing prevention/intervention components, *especially those for adults and teens*;
- *Job training and placement programs* were a particular weakness, with few instances of successful implementation; and
- Resident participation was generally better in *children's activities* than in those for adults or teens, but participation tended to be uneven and ephemeral in many types of activities.

Exhibit ES.3 summarizes the assessments of the context, design, and implementation factors in each program, revealing clearly how these factors influenced levels of success. The successful programs received high ratings in most factors affecting success, whereas the programs that experienced moderate or mixed success received medium or mixed ratings on these factors, and unsuccessful programs received mostly low ratings.

Programs most likely to achieve substantial positive impacts were those *operating in favorable contexts*: moderate baseline drug and crime problems, sound housing authority management, history of resident involvement and housing authority receptiveness to resident needs, and building on broader anti-drug programs and associated linkages with government agencies and private provider organizations.

Exhibit ES.3
Factors Affecting PHDEP Program Success

Program	Context/Background			Design		Implementation		
	Baseline Conditions of Drugs, Crime, Gangs	PHA Management/ Experience	Resident Organization/ Involvement	Planning Process	Design Features	Implementation Process	Range of Activities	Resident Leadership Roles
Successful Programs								
Portland, ME	5	H	M	H	H	M	M	M
Portland, OR	3	H	M	H	H	H	H	M
Madison, WI	3	H	M	H	H	M	H	H
Savannah, GA	4	H	H	H	H	H	H	H
Moderate/Mixed Success Programs								
Chicago, IL	1	M	M	M	M	M	H	H
Denver, CO	3	M	L	H	H	M	M	M
Jersey City, NJ	2	H	H	H	L	M	L	H
Los Angeles, CA	1	M	L	L	M	M	M	L
Springfield, MA	3	M	L	L	L	L	L	L
Yakima Nation, WA	3	H	L	L	M	L	L	L
Unsuccessful Programs								
Charlottesville, VA	3	L	L	M	M	L	L	L
Dade County, FL	1	M	L	M	M	L	L	M
Oakland, CA	1	L	L	L	L	L	L	L
Pittsburgh, PA	2	M	L	L	L	L	M	M
San Antonio, TX	1	M	L	L	L	L	L	L

Scales: Baseline Conditions: 1 to 5, where 1 is most severe.

Other Factors: L = Low/Negative
M = Moderate/Neutral
H = High/Positive

NOTE: Sites are listed alphabetically within groups.

The successful programs also *scored well in terms of design*: well-balanced programs including law enforcement/security with a community policing focus and prevention/intervention components, planned through a broadly inclusive process.

Finally, they were *highly rated on implementation*: efficiently putting in place a well-coordinated range of law enforcement, prevention, and intervention activities addressing the needs of residents of different age groups, affording residents important opportunities for program leadership, and attracting and maintaining strong resident participation in program activities.

The programs judged to be moderate or mixed successes fall into three groups. The first group, Springfield and Yakima Nation, appear to be exceptions to the value of contextual, design, and implementation factors in predicting program success. Both seemed to achieve moderate success despite low ratings in most aspects of context, design, and implementation. However, both programs faced only moderately serious baseline conditions, in which some improvements had already been observed prior to PHDEP funding. Moreover, Yakima Nation was using PHDEP to continue a previous CIAP-funded anti-drug effort that had been quite successful. Implementation difficulties arose, including long vacancies in key positions and resurgent turf disputes among police agencies, but some additional improvement was achieved despite this.

A second group includes the programs in Denver, Los Angeles and Chicago, where success varied quite dramatically among targeted developments. In the developments with more successful PHDEP programs, key factors tended to be the following: quality of staff; supportive resident leaders, resident organizations, and development managers; and a consequent ability to implement a range of activities. In the developments where the programs were less successful, there tended to be staff problems, lack of support, and resulting difficulty in implementing activities.

A third category of moderately successful local programs consists of Jersey City, which revealed mixed patterns of context, design, and implementation in all targeted developments. In Jersey City, resident involvement was strong in planning and implementation, but there were design flaws (lack of overall coordination and monitoring) and serious gaps in implementation (inability to launch a drug intervention program).

Finally, some powerful common themes emerge regarding the unsuccessful programs. In most of these five sites, lack of success was related to a combination of the following: serious baseline drug and crime problems; little or no history of resident involvement; a housing agency relatively unresponsive to resident concerns; a narrow planning process; design flaws (e.g., poorly balanced strategies, lack of coordination and monitoring); and serious implementation problems (e.g., staffing problems, low resident participation, poor access to services, problems with subcontractors or other provider agencies, and poor administration). In the unsuccessful sites, many of the proposed activities were simply not implemented or suffered from problems that undermined their ability to have any positive impacts.

Recommendations

Out of this evaluation has grown a range of recommendations concerning the local programs themselves, HUD support for local efforts, and the PHDEP program as a whole. The recommendations are based on the entire PHDEP evaluation, including analysis of the grantee survey data and of the fifteen programs selected for intensive study. The major recommendations, which fall under three major headings, are the following:

1) *Recommendations for Local PHDEP Programs*

- ***Improved housing authority management*** in areas relevant to drug elimination; better use of alternative funding sources; increased use of development managers in drug elimination programs; and
- ***Improved program design and implementation***, including broad-based planning and implementation committees; expanded linkages with outside organizations; well-balanced, coordinated and monitored strategies/activities addressing the needs of residents in all age groups; and persistent outreach to gain participation.

2) *Recommendations for HUD Support of Local Programs*

- ***Providing additional technical assistance*** in such areas as evaluation, management improvements, linkages with outside organizations, and resident involvement;
- ***Developing supplementary materials*** for PHDEP applicants and grantees, describing best practices and providing practical suggestions for program improvements; and

- *Improving financial reporting forms* to make them more compatible with standard housing authority forms and practices.

3) *Recommendations for HUD's National Program*

- *Continued support of drug elimination/crime prevention in public housing*, with consideration of some changes:
 - Three options to address concerns about uncertainty of continuing funding are: *grants of longer duration*; *regular formula funding* of drug elimination/crime prevention activities; and *incorporation of funding for drug elimination activities into the operating subsidy*;
 - *Expansion of eligible activities and expenses* in certain areas such as off-site substance abuse treatment/counseling, transportation, food, and incidentals for drug prevention programs; and
 - Requiring local programs to participate in a performance and outcome *monitoring system*.
- *Modifying the scoring system for PHDEP applications* to include credit for key design and implementation improvements discussed in this report;
- Improving *coordination of public housing drug elimination with related efforts*:
 - Integration with HUD efforts to *improve housing authority management*;
 - Integration with efforts to *improve economic opportunity for residents*; and
 - Integration with a *multiagency urban strategy*.

Each of these recommendations is discussed in more detail below.

1) *Recommendations for Local PHDEP Programs*

Improved Housing Authority Management

The evaluation results suggest the need for *housing authorities to commit themselves to management improvements that would result in more effective overall strategies to combat drugs and crime*. There are several areas in which this commitment and these improvements are particularly needed. Applicants for PHDEP grants should be required to present management plans showing how improved management functions will be developed and

integrated with drug elimination efforts, and application scoring should provide credit for well-conceived plans along these lines.

Applicant Screening, New Resident Orientation, and Eviction. Housing agencies should analyze their policies and practices related to applicant screening, new resident orientation, and eviction to ensure that they contribute to drug elimination goals rather than undermining them. As shown in this evaluation, screening and eviction can be useful tools if they are employed with sensitivity to residents' circumstances, concerns, and needs. For example, tenant screening should incorporate background checks of applicants' criminal history, as long as such information is balanced by available evidence of subsequent rehabilitation and improvement. Checks of credit and financial capacity are also valuable, as long as they do not arbitrarily exclude the very poor who may be able to offer little evidence of either financial capacity or incapacity. It may be valuable on several grounds to involve residents in the screening process.

New residents should receive complete orientation on the mutual responsibilities their leases create, on the rules and standards of conduct, and on available programs and services. Emphasis should be placed on the handling of drug incidents and on residents' roles in maintaining a safe environment. Current residents can be involved in providing this orientation, as a means both of conveying valuable informal information and creating some initial acquaintance and support.

Finally, eviction may be useful in ridding developments of persons who deal drugs or commit crimes, but it should be viewed as part of a process in which residents are first warned (and given encouragement, support, and reasonable opportunity to remedy the situation) before being actually evicted. In addition, care should be taken with eviction programs that encourage residents to "snitch" on their neighbors, since these may be exploited in the service of grudges and increase mutual mistrust, not only among residents but also between residents and the housing authority. One way to avoid a destructive approach may be to include residents on grievance panels reviewing evictions.

Coordination of Funding with CGP, CDBG and Other Programs. The Comprehensive Grant Program and the residual CIAP program in small housing authorities offer numerous opportunities for coordination with PHDEP. In particular, modernization funds can be used to make many physical improvements related to drug elimination, thus freeing PHDEP

funds for other activities. Coordination between modernization projects and drug elimination is vital, wherever changes are made that have security implications. It appears to be unusual for the housing authorities' physical planning and development staff to have links to PHDEP staff, yet the latter can provide very useful input to modernization project planning. If restrictions are eased on CDBG support for drug elimination activities, housing authorities should also seek to take advantage of this potential source of funding.

Involving Development Managers. Housing authorities should ensure that development managers and other development-level management staff are fully involved in planning and implementing PHDEP activities in their developments. By giving development managers a chance to help shape programs, housing authorities have a better chance of gaining these managers' crucial cooperation and support during implementation.

Some public housing agencies employ residents as part-time assistant managers. This may be a useful strategy for improving communication between residents and managers, particularly where there are racial, ethnic, and even linguistic differences between staff and residents. Applicants for PHDEP funding should be required to demonstrate strategies for involving development-level management in their drug elimination program.

Improved Design and Implementation of local PHDEP Programs

Recommendations in this subsection address the following areas of design and implementation: establishing planning and implementation committees; expanding outside linkages and support; developing a balanced program; targeting developments; staffing a program; involving residents; and carrying out persistent outreach. The scoring system for PHDEP applications might be modified to take note of the features recommended in this section.

Establishing Planning and Implementation Committees. An important finding of this evaluation is that successful PHDEP programs are those which involve all key actors and entities in both planning and implementation. A useful way to do this is to form planning committees composed of representatives of housing agency central office and development management, local government, residents, police, social service agencies, and service provider organizations. Such committees could and should play an integral role in designing the drug elimination effort rather than simply reviewing an already developed plan. Moreover, the committee should be continued in a monitoring and advisory role during implementation. Regular meetings should

be held, during which implementation progress and plans are discussed and solutions formulated for problems that arise. With the multiple agencies and organizations involved in most PHDEP programs, an active implementation committee can be very useful in promoting coordination and maintaining the commitment of all parties to the effort.

Expanding Outside Linkages and Support. Another key finding of the evaluation is that housing agencies with prior anti-drug experience and broad linkages and government support related to such efforts are more likely to succeed, while housing authorities operating in isolation are less likely to be successful.

Therefore, it is important for housing agencies to foster and take advantage of any such existing or incipient linkages. Local government leaders and agencies, law enforcement departments, and private provider organizations, as well as residents and resident organizations, all appear to be critical players in developing and implementing an effective approach to crime prevention and drug elimination.

The evaluation noted the clear absence of local government support (other than law enforcement agencies) in a large number of the intensive-study sites. Gaining the active commitment and involvement of the mayor and/or city council for the PHDEP effort, and pressing for their recognition of responsibility to support anti-drug initiatives in public housing, should start before the PHDEP application planning is begun. In concrete terms, city agencies can be asked to provide on-site programming, staffing, and/or financial support for PHDEP activities. Celebrations of achievement and holiday events are ideal occasions for bringing local officials into public housing developments and showing what can be done there.

Developing a Balanced Program. As discussed in the evaluation report, an overall drug elimination strategy must address both immediate problems and underlying symptoms. There is evidence from the study showing that increased safety and security in a development may be a prerequisite for the success of drug prevention and intervention activities. However, a program that attends only to the first part of this equation (security) is clearly imbalanced. Therefore, in both design and implementation, programs should aim for a *balance of law enforcement/security and prevention/intervention* strategies. The evaluation shows that:

- Law enforcement/security components based on a *community policing* model are strongly associated with overall PHDEP success, irrespective of the locus of the police department implementing such an approach. Community policing increases police visibility in developments, fosters improved relationships with residents

(ultimately leading to better cooperation and increased willingness to provide information to police), and offers valuable cross-referral opportunities (police may refer residents to prevention/intervention components, and the latter may refer problems needing police attention to the officers). This kind of coordination and cooperation are only possible when police take a broader view of their roles and responsibilities in the community.

- The prevention/intervention component of a drug elimination program should include *activities addressing all age groups*—children, teens, and adults. Most PHDEP programs examined in this evaluation were far more successful engaging younger children than either teens or adults. Substantive involvement of residents from earliest planning through implementation will increase the likelihood that the balance of activities will be appropriate for local needs and appealing for residents.
- The overall strategy should also include *increased attention to adult education, job training and placement*, which have been serious weaknesses of local PHDEP programs thus far, and yet are vital means of engaging adults in anti-drug programming.
- Experience shows the importance of making *formal arrangements such as subcontracts or memoranda of understanding with outside entities slated to provide drug counseling, treatment, or other services* under the grant. Particularly in the absence of a pre-existing relationship or experience between the housing authority and the provider organization, formal legal instruments provide more assurance that services will be delivered with the quality and in the quantity expected.
- In addition, *ongoing monitoring of provider agencies* is a crucial part of effective program implementation. Such monitoring is most effectively done by on-site PHDEP staff.

Targeting Developments. HUD takes no official position on whether local drug elimination programs should target a subset of developments, all family housing, or the PHA's entire stock. However, applicants and grantees should clearly consider the arguments for and against targeting—based on cost-effectiveness, fairness, and political considerations. Residents should also be involved in this decision. If it is decided to target certain developments, however, the targeting should be defined so that *sufficient resources are allocated to each development selected*, to make the implementation of planned activities and the achievement of planned objectives realistic. Moreover, *services should be accessible to all the residents* and ideally provided on-site. At the same time, however, some residents' sensitivity to exposure and

stigmatization as well as others' preference for convenience in accessing services may suggest a combination of on- and off-site drug treatment/counseling.

Staffing the Program. The PHDEP evaluation has revealed the importance of coordination and monitoring of PHDEP activities at all levels. Therefore, if resources permit, it is extremely important to include a *full-time coordinator for the overall PHDEP program and paid PHDEP staff in each targeted development*. The overall coordinator is charged with seeing that all components of the program work smoothly and in a complementary fashion. The on-site staff ideally provide outreach and case management, ensuring that residents are connected with activities appropriate to their needs, as well as conducting or supporting various program activities and monitoring outside providers.

Building Resident Leadership

The PHDEP programs with the most opportunities for resident leadership have tended to be the most successful. Consequently, housing agencies should take steps to *increase opportunities for resident leadership* and build resident leadership capacity. Incorporating resident leadership training and related initiatives as explicit goals of drug elimination programs is desirable.

It is also recommended that local programs be designed to *allocate as many PHDEP positions as possible to residents*. Residents generally are able to build trusting relationships in the communities more quickly than outsiders, and such relationships are critical to the success of drug elimination programs. Hiring residents also demonstrates the housing authority's genuine commitment to resident involvement and economic advancement, and benefits the residents hired as well as the community at large by building capacity for ongoing resident leadership.

Another goal ought to be to make *resident organizations responsible for entire components or activities* of the local program. This has been successfully accomplished, both in sites with long and strong histories of resident involvement and in sites without such a background. It should be a goal everywhere, with more housing authority support when there is less resident organization capacity, thus again demonstrating the commitment of housing authorities to give real power and responsibility to residents to address problems in their own communities.

Although *tenant patrols* are very difficult to implement, they represent particularly important vehicles for developing resident leadership and building residents' commitment to community improvement. (Chicago is an excellent example of this.) Thus, grantees should make intensified efforts to support resident patrols.

This evaluation has demonstrated the difficulty of developing meaningful resident involvement in drug elimination programs. One possible approach to inducing increased resident leadership and involvement is the concept of *reciprocal commitments between residents and housing authority management*. In Los Angeles, for example, the housing authority is attempting to formulate development-specific plans in which it commits to building a perimeter fence and expanding security services in return for residents' commitment to implement resident patrols and provide information in support of lease enforcement and law enforcement actions.

Carrying Out Persistent Outreach. Experience in a number of the evaluated local programs clearly shows that simply opening an office and distributing flyers advertising the availability of services is not sufficient to attract and retain broad resident participation. This is particularly true for drug counseling and treatment programs, which require participants to acknowledge and confront difficult problems. Participation in other less intrinsically threatening activities may also be undermined by the climate of fear and mistrust that exists in many developments. As a result, *repeated and persistent outreach* to residents regarding activities and services is absolutely essential. Specific PHDEP staff members should be charged with responsibility for outreach and should be given training and sufficient time to carry out this critical function effectively.

2) Recommendations for HUD Support to Local PHDEP Programs

Based on the evaluation results, three areas have been identified in which HUD could provide assistance to housing authorities as they plan and implement local drug elimination programs: (1) additional technical assistance; (2) supplementary materials providing practical guidance to PHDEP applicants and grantees; and (3) improved financial reporting forms and procedures.

Additional Technical Assistance

Although HUD already maintains an active technical assistance program for PHDEP grantees, several housing authorities reported that they could benefit from *additional technical assistance* in the areas of evaluation, resident involvement, management improvements, and expanding outside linkages and support. Particularly if HUD implements a PHDEP performance and outcome monitoring system currently under development, there may be a need for technical assistance to grantees in collecting and reporting the data, as well as for validation of data quality and completeness. In addition to submitting the required monitoring data, some grantees may still wish to undertake their own in-depth program evaluations. HUD should encourage this activity and provide technical assistance in designing and performing local evaluations. Many PHAs could also benefit from technical assistance on ways to encourage and support resident involvement and to develop linkages with outside agencies and organizations.

This evaluation observed a number of problems posed for PHDEP by larger aspects of housing authority management approaches, policies, and practices. As a result, HUD should consider providing *additional training and technical assistance in key aspects of housing authority management* that bear particularly on the success of drug elimination programs. These include the following:

- Integrating *applicant screening, new resident orientation, and eviction policy* into the overall drug elimination and crime prevention strategy;
- Ensuring that *development managers* are brought into the process of planning and implementing drug elimination programs, and have adequate authority to help coordinate and monitor such programs in their developments;
- Encouraging development managers to be *"mayoral" rather than strictly "bureaucratic"*—that is, to be regularly out among residents, listening to their concerns, responding to their needs, and building respectful and trusting relationships with them;
- Increasing the institutional mechanisms for, and regularity of, *consultations between housing authority staff and residents* on a range of management and community matters;
- Encouraging the *coordinated planning of drug elimination strategies with modernization work* under the Comprehensive Grant Program (CGP) and Comprehensive Improvements Assistance Program (CIAP);

- Increasing housing authority attentiveness to *maintenance, beautification, and other functions bearing on the physical appearance* of developments, as a sign to residents and others of the agency's care, pride, and commitment; and
- Assisting housing authorities to prepare *management plans* integrating drug elimination efforts and broader management functions.

Supplementary Materials for Applicants and Grantees

HUD has already prepared materials encouraging housing authorities to commit themselves to drug elimination and offering brief case studies of promising local efforts. However, this evaluation has generated a wealth of additional data suggesting practical, concrete recommendations for local programs. Therefore, HUD should consider preparing a brief, focused publication summarizing this new information for PHDEP applicants and grantees.

Improved Financial Reporting Forms

Some grantees expressed concern about the financial reporting forms being used for PHDEP. Their major recommendation was that *PHDEP forms and reporting procedures be made more compatible with standard housing authority accounting and reporting practices*. Regardless of whether HUD support for drug elimination were to be converted to operating subsidy or remain a grant program, public housing agencies urged that the financial accounting and reporting be integrated with their regular cycles of fiscal years and budget preparation and submission.

3) Recommendations for HUD's National PHDEP Program

Before discussing recommended changes or enhancements to the national PHDEP (or successor) program, it is important to recognize the positive aspects of the current program. These include the wide range of eligible activities (which has been further expanded over the life of the program); the importance assigned by HUD to resident involvement in local programs; and the flexibility regarding targeting of developments (HUD has essentially left this up to the best judgement of housing authorities applying for funding).

The recommendations for improvements at the level of the national program address three major areas: (1) continued support of drug elimination, with consideration of some changes regarding the terms and form of support, eligible activities, and local program

monitoring; (2) improved integration of public housing drug elimination programs with related efforts within and outside HUD; and (3) modifications to the scoring of PHDEP applications to give credit for key design and implementation improvements recommended in this report.

Continued Support for Public Housing Drug Elimination Programs

In the face of often daunting baseline crime and drug problems and implementation obstacles, many PHDEP grantees have achieved significant success. Therefore, we strongly recommend that *HUD continue supporting drug elimination and crime prevention efforts in public housing*, through PHDEP or, as proposed in the Administration's draft Housing and Community Development Act of 1993 (S.1299), through an expanded concept called Community Partnership Against Crime (COMPAC). We also believe HUD should consider some changes that would enhance its national program.

First, HUD should consider changing the *terms and/or the form of support for drug elimination*. Survey results and interviews at intensive-study sites both show that the current PHDEP program, with its requirement of reapplying for competitive grants each year, introduces serious uncertainty, with unfortunate consequences. Without assurance of continued funding, grantees have difficulty hiring and retaining high-quality staff, building and preserving linkages with outside organizations, developing and holding residents' trust and participation, and showing measurable results within a one- or two-year grant period. Implementing complex and multi-faceted programs takes time. On the other hand, any form of guaranteed continuing funding might reduce programs' incentives to perform.

There are three possible options for addressing these problems: (1) *grants of longer duration*, contingent on annual review against performance standards (possibly utilizing the PHDEP monitoring system currently under development); (2) *regular formula funding*, based on agency size and/or documented baseline conditions, which could also be made contingent on annual review against performance standards; and (3) *incorporation into the public housing operating subsidy*, a change of great scope and implications, which might not ultimately mean increased resources for drug elimination efforts even if Congress increased the overall amount of the subsidy.

Second, there should be a *further expansion of eligible activities and expenses* under PHDEP or its successor program. In particular, HUD should consider allowing support for off-

site drug counseling and treatment, given some of the problems uncovered in this evaluation regarding residents' hesitancy to attend on-site programs for fear of exposure and punitive action. Another commonly mentioned area where PHDEP funding support would help is to pay expenses for *transportation, food, and incidentals (such as T-shirts) for drug prevention activities*. Such support, according to grantees, would help to increase resident participation. It could, of course, be limited in dollar amount or as a share of the total grant.

Third, HUD may wish to consider *requiring grantee participation in a program-wide performance and outcome monitoring system*. Such a monitoring system is currently being developed for HUD. If implemented, the monitoring system will seek data on crime statistics, certain housing authority management indicators suggestive of quality of life (e.g., vacancy rates, unit turnaround times), participation statistics for PHDEP-supported activities, linkages to outside agencies, and responses to standard resident survey questions (concerning topics such as perceptions of crime and drug use and quality of life in developments). HUD could require grantees to submit these performance and outcome monitoring data (and perhaps require that program progress be demonstrated through use of these data) as a pre-requisite for continuation funding each year. Moreover, the monitoring system would provide a database of standard elements for ongoing evaluation of local programs and the national effort. This study shows that few grantees have given substantial attention to their local evaluation components. The availability of standardized reporting and a centralized database would make local evaluation of each program easier to carry out.

Modifications to Application Scoring

This evaluation has recommended a number of design and implementation features that seem to enhance local programs' likelihood of success in their drug elimination efforts. We suggest that HUD modify its scoring of applications to give credit for these key features. Moreover, the actual implementation of these features should be monitored over the course of the grant.

Integration of Public Housing Drug Elimination with Related Efforts

There are a number of ways in which HUD could seek and support the coordination of drug elimination/crime prevention in public housing with related efforts addressing public

housing management, resident economic opportunity, and the need for a larger "urban strategy." These steps begin within the housing authorities themselves and extend to a number of other agencies and entities involved in related activities.

First, HUD should *seek better integration of drug elimination efforts with larger management and policy initiatives in public housing*. For example, there is widespread debate over public housing as "housing of last resort:" the need to find permanent housing for homeless individuals and families as well as those carrying high rent burdens or living in substandard or overcrowded housing, versus the widely perceived need to maintain a safe and secure environment for residents. Clearly, there is a tension here, because becoming the housing of last resort may necessitate accepting applicants who have serious substance abuse, behavioral, and familial problems that may pose problems for other residents. This bears directly on housing authorities' policies and practices regarding resident screening and eviction and suggests a review of the regulations about the federal preferences for admission and about applicant screening and selection.

In general HUD should consider requiring PHDEP grantees to submit *management plans* in their applications showing how drug elimination efforts (including law enforcement/security) are to be integrated with other management functions such as screening, eviction, maintenance, and modernization. Such a plan would (for example) detail how modernization work would coordinate with or support anti-drug efforts. It would also cover the role of the site manager and use of operating funds to focus maintenance and improvements on targeted developments.

Second, and related to the first point, HUD should seek to *integrate public housing drug elimination into a larger strategy for addressing urban problems*. This might involve a number of steps, including encouragement of more economic development initiatives as part of PHDEP or of programs coordinated with PHDEP, and more coordination with other federal agencies and programs addressing aspects of urban drug and crime problems. Lack of economic opportunity in legal endeavors is at least one of the factors underlying both drug dealing and drug abuse. While a program like PHDEP can by no means be solely responsible for economic development, HUD could make it clearer that job training and placement activities are critical parts of an overall drug elimination strategy and vital to sustaining in the long term the impacts achieved by law enforcement and prevention/intervention components. Furthermore, HUD

might give more emphasis in program regulations to the important roles residents can play as paid PHDEP staff, thus benefitting themselves (skills development, employment experience, and income) and the community (commitment, role models, and mutual support).

The new Urban Revitalization Demonstration at HUD is directed at public housing sites that are plagued by a complex of problems similar to some of the developments in the PHDEP evaluation. As that program develops, the anti-drug and anti-crime initiatives it contains should learn from the PHDEP experience and be coordinated with local PHDEP programs operated by the same authorities. Other HUD programs, including Community Development Block Grants (CDBG), are also recommended for greater coordination with drug elimination in public housing. HUD should consider easing the restrictions on use of CDBG funding to support drug elimination activities. Specifically, in order to make law enforcement services and other drug elimination activities eligible under CDBG, such activities would have to be exempted from the program's cap on support of public services.

Many other federal agencies are also involved in activities and programs bearing on drug elimination and larger urban issues. These include the Department of Justice (e.g., Weed and Seed) and the Department of Health and Human Services (e.g., the Substance Abuse and Mental Health Services Administration's drug prevention partnerships and expanded drug treatment programs). HUD should take a strong position in favor of *coordinating public housing drug elimination efforts with related initiatives in other agencies*, working toward the Department's goal of assuming the mantle of national urban leadership. Such coordination among agencies and efforts related to drug elimination has already been recommended in a report to HUD on severely-distressed public housing.¹ Moreover, this report has recommended using drug elimination funds to leverage other support for, and foster coordination with, anti-drug and anti-crime efforts in the broader communities beyond public housing developments.

1. *The Final Report of the National Commission on Severely Distressed Public Housing: A Report to the Congress and the Secretary of Housing and Urban Development* (Washington, DC, August 1992).