My comments are in three parts: First, a response to Arthur Young; second, a brief reaction to Frank Kristof; and, third, a general observation on the complexity of the subject.

Any technique of measurement, whether a verbal scale or a mechanical device, can be critically examined only in the light of the purpose the findings are to serve. Purpose will dictate the type of measuring instrument and the degree of precision appropriate.

Mr. Young has clearly, and in excellent detail, described the efforts of the Bureau of the Census, beginning in 1940, to identify housing that is a serious hazard to health and safety. The conclusions of Working Paper #25, that the statistics on condition are unreliable and inaccurate, combined with the data collection method planned for 1970, has led to exploratory studies designed to provide a new means of identifying deficient shelter.

While the 1960 method of measurement may be considered a failure as far as pinpointing individual substandard units, it has been thoroughly successful as a tool for delineating neighborhood areas that call for intensive and more specific measurement. Obviously too much was expected of a statistical approach that lacked precise definitions and depended on observers with limited training and diverse background.

The subject of housing quality is vast and complex. As a continuum from best to poorest, quality involves environment, structure, and use.

Oldest and most significant are the concepts and measurements expressed in building codes. Together with zoning, they provide regulation of the physical aspects of the structure and its relationship to nearby buildings.

Since only about 2 per cent of the housing supply comes into being within any one year, the maintenance and use of the existing inventory is of great concern. A Model Housing Law developed in 1914 was published in revised edition in 1920. In the preface Lawrence Veiller commented on the changing environment, making special reference to the automobile and the difficulties in adapting a model ordinance to local conditions. Light, ventilation, sanitation, fire protection, maintenance, and cleanliness, were covered. Environment, structure and use, as essential aspects of measurement, are clearly recognized.

Three years earlier (1917) a simple description of bad housing had been published by the Housing Committee of the National Association of Real Estate Boards. It read:

"WHAT IS BAD HOUSING?"

"Houses having insufficient yards, making poorly lighted rooms.

"Houses that are damp, unsanitary, filthy, in bad repair, exposed to undue fire peril, vermin infested, disease infected; having unclean yards and alleys; insufficient water supply, without toilet accommodations adequate to comfort, cleanliness and privacy; having overcrowded unventilated and dark rooms; without privacy, such houses are dangerous to the moral and physical health of the population of your city."

This definition of inadequacies was followed by a recommendation that local housing committees of real estate boards familiarize themselves with the Model Housing Law published by the Russell Sage Foundation and work with the National Housing Association headed by Lawrence Veiller.

In the interval between the collapse of the economy in the late '20's and the beginning of recovery at the end of the 1930's the Association moved forward in its concern regarding the condition of housing through activity centered in a Committee on Rehabilitation, which led to formation of the Urban Land Institute by a group of NAREB past presidents. Interest and basic concern of the Urban Land Institute at the time, was with deterioration of older residential areas that surrounded the monumental centers of cities. Its studies and activities led to the first proposal calling for Federal cooperation with municipalities for the acquisition of land in slum areas to be redeveloped by private enterprise. This was S.1163, introduced in the 78th Congress in 1943 by the late Senator Wagner at the request of the U.L.I.
If we are to be realistic, it is evident that the measurement of housing quality and public policy related to it should take two forms. The first is expressed in building codes and local housing ordinances with the highest possible standards of safety, maintenance, and sanitation, and severe personal penalties for violation. The second is the collection and use of Census data to identify areas that require attention, and for policy formulation related to Federal grants-in-aid and loans.

Since the Housing Act of 1954, which introduced the requirement of a local workable program, communities have been expected to prepare a comprehensive plan and to adopt adequate codes and ordinances. To a degree this will draw the two closer together and the proposed use of the American Public Health Association penalty points as a method of rating housing in the 1970 Census, will increase the similarities.

There will, however, always be vital differences.

The measurement of housing quality associated with local inspection, whether based on building or housing codes, is a continuous process, with personal penalties for non-compliance. The Census, as a data collection vehicle, measures housing quality only at wide intervals, and for individual units may be obsolete long before it is published. We can expect however, that the Census will continue to provide data for successfully delineating areas for more specific attention, a function that it has served well in the past.

This concludes my comments on Arthur Young's paper.

I disagree with Dr. Kristof that the measurement of housing quality is a public policy issue. Measurement is a scientific concept and should be totally separated from the action to be taken on the basis of its findings. In addition, policy implications mean to me much more than Federal legislation. They include the formulation of policy by the business sector, by State and municipal governments, and by interested private citizens as well. Public policy, in the basic sense, means attitude. I believe there is unanimity in the concern for better quality housing in a suitable environment for everyone.

An evaluation and goal for the Nation, centered on New York City data is, in many ways, irrelevant. By its own definition, New York City is atypical. Rent control has been maintained on the premise that the City is different from other metropolitan communities and non-metropolitan areas. The administration of control has flagrantly disregarded costs of maintenance and the role of maintenance in housing quality. The dismal study of vacant and abandoned structures testifies to the role of rent control as a destructive force, and points up the futility of using New York data as illustrative of other communities.

Further, New York City is atypical in the land use patterns through which it is developed, in the relationship of owner to renter occupancy; and in the percentage of tax-supported housing that has been built and in many respects disappointed its advocates who saw in it a solution to a broad spectrum of human ills.

To the degree that the phenomenon of abandonment has been observed in cities that do not have rent control, detailed area studies would be fruitful. The role of environment and of use in relationship to individual quality of a housing unit, might be studied for better understanding.

For any community, however, the suggestion that a census of housing should provide data indicating the degree of rehabilitation needed in dollar amount, is to fail to recognize the limitations of a census type of data collection and the purpose the results can be expected to serve. Estimating construction cost is a highly specialized function and requires training unlike that characteristic of an average census enumerator. If city officials are embarrassed by the scantiness of their information, local studies should be undertaken, tailored to the data needs of the particular city and the questions for which answers are sought.

This concludes my comments on Frank Kristof's paper.

In closing, I'd like to mention two general areas of concern regarding the measurement of housing quality and its policy implications. These are in addition to recognition that the subject of housing quality involves environment and use, as well as structure.

The first area of general concern revolves around the changing definition of a housing unit, depending on whether the shelter is occupied or vacant. Since a household and an occupied housing unit are synonymous by definition, ten per cent of the inventory is unoccupied.
The second is even more significant for the long run and, although touched on briefly by Dr. Kristof, should be given far broader attention. The need to improve the quality of housing of lower income families through subsidy is widely recognized. Virtually every legislative proposal arising out of present housing discussion that is directed at this problem, however, is expanded to include "middle" income groups which encompass the bulk of the population. Subsidies may be offered to some members of this group at times when fiscal and monetary policy lays a heavy burden on other members of the same group who are endeavoring unassisted to secure housing in the market place. We should admit that Federal housing subsidy on a vast scale is inevitably intertwined with monetary and fiscal policy and with the whole subject of horizontal tax justice.
### IV

**SURVEYING SOCIAL CHANGE IN COMMUNITIES**

Chairman, MARGARET E. MARTIN, U. S. Office of Statistical Standards

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