The papers prepared by Messrs. Kristof, Young, and Selove, provide a good point of departure for an exploration of "where we go from here," on the whole subject of housing quality and the broader and more important question of evaluating the urban environment. There are, I am sure, many people at the Bureau of the Census who sincerely wish that the Census had never been brought into the business of providing housing quality indicators and would be most happy if the whole matter could be swept under the rug. This can never be. As Kristof has observed, the need for the identification of the magnitude of the housing job faces every policy maker in the field.

As he points out, the absence of good agreed-upon criteria are a continuous source of embarrassment and confusion to housing and urban renewal administrators and to the legislative bodies which must provide the public funds so necessary to carry out the job. This is by no means the fault of the Census Bureau. Rather, one of the major causes of our present confusion results from the failure of either the Congress which put the statutes on the books or the Department of HUD and its predecessor which has the prime responsibility for funding slum clearance and low cost housing activities in the United States, to take the lead in setting minimum standards of housing quality. For more than 30 years the Congress of the United States has been adding to the body of legislation authorizing the expenditure of Federal funds for the elimination of slums and the promise of decent, safe, and sanitary housing for families of all incomes. In my mountain retreat where I prepared for this program I did not have access to the legislative history of housing and urban renewal in the United States. I cannot, therefore, recite the specific number of public laws which contain some reference to the question of "slums," "urban blight," "unstandard or inadequate housing." Through the years our legislative draftsmen, many of whom have been associated with HUD or its predecessor, and committees of the Congress, have been very free in their use of language referring to bad housing and bad environment. They have, unfortunately, been extremely niggardly in their specifications as to what they meant by these terms. In the Housing Act of 1949, the Congress went so far as to direct the Housing Administration to report to the Congress and the President on the state of the housing situation and the rate of progress being made in meeting the Nation's housing needs. Implicit in the meeting of housing needs is, of course, the elimination of bad housing. The stated national goal was the promise of a decent home in a suitable living environment for every American family. Yet the Congress gave not so much as a hint as to what a "decent" or for that matter an "indecent" house was nor what constituted a "suitable living environment."

Since the responsibility for reporting to Congress and the President on unmet housing needs is currently lodged with the Secretary of Housing and Urban Development and before the creation of the Department of Housing and Urban Development, with the Housing Administrator, one can well ask why has he not taken the lead in establishing national norms. Over the years it is true that the Secretary or his spokesmen have talked of the magnitude of national housing needs but nowhere, I repeat, nowhere will you find any official statement of what is and is not a "substandard" house or what is or is not a "slum."

The argument has been made that situations vary from place to place, that what is acceptable to some communities is unacceptable to others. Therefore, it has been argued, it should be the responsibility of localities to set their own norms. This contention used repeatedly over the years is in my judgement completely specious. Obviously a locality has the right and the privilege of setting its own standards of acceptability. Some plush bedroom community may elect to refuse to permit any house to remain in occupancy which does not have a garbage disposal, four electrical outlets in every room, a minimum of 2-1/2 baths, and a garage or carport adequate to shelter all automobiles owned by the occupants. Other communities may settle for housing which has at least a single bathroom, a weather repellent structure and no blatant violation of the National Underwriters Electric Code.

This does not in any way obviate the need for the Federal government through its Department of Housing and Urban Development being very specific about exactly what its criteria will be as far as the disbursement of Federal funds for urban renewal, for low cost housing, and for Model Cities. In the absence of such an explicit statement by HUD it is small wonder that this kind of confusion exists at the local level as Dr. Kristof points out in his paper. Although they are all under one overall management one might often come away with the impression that those who oversee the CRP program for HUD never speak to those in charge of public housing or of plain old urban renewal.

Both Kristof and Young make passing reference to but do not treat in depth an important facet of this whole housing quality problem, namely, the identification of slum areas and unsatisfactory neighborhoods as opposed to the identification merely of individual bad houses. As increasing
emphasis is placed upon community renewal and upon the upgrading of vast neighborhoods through the Model Cities approach, the great and urgent need is for some specific ground rules for measuring the quality of whole neighborhoods. How can the Secretary of Housing or the Congress, to say nothing of the localities themselves, tell whether a Model Cities effort is worth the candle when there are no agreed-upon criteria for identifying before, during, and after the fact, the quality of model neighborhoods?

The problem of environmental quality inherently is a tough one. I know because I have been involved in much of the experimentation which has been done on this subject over the past twenty-five years. I had been hopeful that perhaps from the present New Haven Use Study some clues would emerge of procedures which could be used for delineating slum or blighted areas by a merging of Census housing and population statistics with locally generated data to develop a mosaic which would differentiate neighborhoods of varying characteristics and quality. As things stand, HUD is failing to provide direction in this much needed research.

All of what I have said thus far, it seems to me, adds up to the need for the Secretary of Housing and Urban Development to take the initiative in setting what he regards as minimum standards which will make entire slum areas and their inadequate housing eligible for Federal assistance. Communities may at their option elect to enforce higher standards, but for purposes of Federal grants only those units and those neighborhoods the HUD minimum would qualify for financial assistance.

This brings me to the really gritty part of the problem, the matter of objectively measuring neighborhood and structural quality in accordance with whatever standards HUD sets forth. Clearly it is not now nor has it ever been the responsibility of the Census to label houses as acceptable or unacceptable. Rather, as Young and Selove point out, it is its responsibility to provide measures which can be applied locally and nationally to identify bad housing according to the criteria set up by the user—most often either HUD or local agencies receiving HUD money.

The reluctance of HUD to speak its mind has not helped the situation at the Bureau of the Census. So long as HUD has not taken the lead and said what it needs for evaluating the urban environment and its housing, Messrs. Young and Selove and their colleagues in the Housing Division have been fighting a hard battle within the Bureau to end the efforts to develop suitable measuring sticks for 1970.

Their task has been complicated by the decision of the Census to shift, in 1970, from an enumerator on the doorstep census to a mail census, i.e., one in which the respondent receives his questionnaire by mail, completes it himself and mails it back. Without visits to individual dwellings by trained enumerators, Census is obviously restricted in what can be collected that will be meaningful. In fact, however, there the doleful consensus of Working Paper No. 25 that, "there does not appear to be any feasible method of improving the quality of enumerator ratings in a decennial census." I have been involved in many tests and much experimentation along these lines. I realize the task is a tough one, but I submit that so far as developing useful national and SMSA benchmark data—not block by block detail—well trained enumerators could produce meaningful data even in a census type enumeration as a part of the components of change program. While improvements could be made in the techniques used by decennial census enumerators this will never fully meet the needs of housing data users. Instead, what is needed is the establishment of a regular recurring housing inventory survey which is oriented to the housing supply rather than to the household count. Certainly housing is important enough in the national economy to warrant such a regular survey just as a recurring survey of the labor force is an accepted piece of basic statistical fact finding. I would urge that HUD join forces with Census to secure the necessary funds to establish such a survey on a permanent basis.

As for the research which Young and Selove discuss I am inclined to believe they place greater confidence in APHA than is warranted. I fear it is merely a question of the grass in someone else's pasture looking greener. My personal observations of APHA rated houses in Louisville and some earlier experiences with an APHA rating structure in Washington, leaves me a skeptic about what may come from that venture. What it seems to me is urgently needed is some intensive research to develop procedures which can minimize the errors which creep into present day APHA ratings. With the stake it has in this whole question of better measures of the urban environment I submit that this is an area into which HUD could well invest a substantial sum of its research money to enable Census and APHA to arrive at a more fool-proof procedure.

Perhaps it is because I have become mellow from sitting on my mountain top these past two months but I am inclined to support Young's proposal for testing the use of rent and value figures as criteria for "bad" housing. I suspect that it is going to be necessary, however, to go beyond a Negro—Non-Negro dichotomy. Puerto Rican, Mexican, and Indian families face the same kinds of market pressures as do the Negroes.

Turning for a moment to the work which is currently going on in New Haven, I feel that HUD will be most remiss if it fails to provide whatever financial support is necessary to assure utilization of the New Haven Use Study results for testing the feasibility of identifying not only "bad" houses but "bad" neighborhoods. The urgency of this is brought home in Dr. Kristof's paper when he points out the loss to the supply of good or at least salvageable units in bad neighborhoods.
In conclusion, let me say my hat is off to Art Young and Joe Selove for the work they have done and are proposing. If I do not share their enthusiasm or optimism for success along certain lines it is no lack of confidence in their skill. It is merely that after floundering around in this morass myself for a quarter of a century I have developed enough bruises and enough scar tissue to make me cautious. As time begins to run out on us it becomes increasingly urgent that by one device or another HUD, in its several manifestations, must be forced to the table to spell out with greater specifications than it has ever done up until now, precisely what it needs and how it will use the data it seeks. The need for such an explicit statement from HUD becomes all the more urgent as Census attempts to fend off efforts by misinformed Congressmen to curtail the size and scope of the 1970 census. The voice of HUD spoken loud and clear on the issue, with explicit examples of how the lack of data could seriously hamper the effective implementation of HUD programs, could give the Census the added muscle it needs in the present struggle. Somehow something seems to be a little bit out of focus when Congressman Olsen has to offer an extended defense of the 1970 census including the need for measuring housing quality and yet none of the papers I read indicated any statement of support from the Secretary of Housing and Urban Development.